

FACILITIES CLOSURE REPORT

**TRENT TUBE DIVISION
FULLERTON PLANT
COLT INDUSTRIES, INC.**

**2100 E. Orangethorpe Avenue
Fullerton, California**

FOR SUBMITTAL TO:

**CALIFORNIA DEPARTMENT OF HEALTH SERVICES
HAZARDOUS WASTE MANAGEMENT BRANCH
107 South Broadway, Room 7128
Los Angeles, California**

March 1985



**Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088**

TABLE OF CONTENTS

<u>Title</u>	<u>Page</u>
I. Background Information	1
II. Revision of Closure Plan Prior to Actual Closure	2
III. Actual Closure Activities	2
IV. Closure Certification	3
V. Additional Cleanup Requirements	3
VI. Site Assessment	4
VII. Site Remediation Activities	5

List of Appendices

- A Interim Status Document and Closure Provision
- B Closure Plan and Notification - Submitted on August 26, 1983
- C Revised Closure Plan and Comment Letter form Regional Board
- D Photos of Excavated Areas and Manifest Forms Showing Disposal of Materials Shipped During Initial Closure - March-May 1984
- E Certification of Closure - August 29, 1984
- F Letter Comment by Department of Health Services and Proposed Site Assessment Plan
- G Proposed Site Remediation Plan
- H Correspondence Regarding Air Quality Board Evaluation Permit
- I Photos of Excavation and Manifest Form Showing Disposal of Excavated Soils Shipped to Disposal During Remediation Work - February 11, 1985
- J Department of Health Services Comment Letter on Remediation and Excavation Plan
- K Photos Showing Remediation, Drawings of Revised Excavation Limits, and Manifests showing Proper Disposal of Contaminated Soil Shipped to Disposal at Casmalia Resources - February 25-28, 1985

I. Background Information

On April 6, 1981, the Fullerton operation of Trent Tube Division of Colt Industries was issued Interim Status Document CAD 008325110 by the State of California, Department of Health Services (DOHS), which authorized the treatment and storage of hazardous wastes on the Plant premises subject to a number of conditions as described in an attachment. A copy of that document and the attachment pages referring to closure are enclosed as Appendix A.

One of the conditions in the Interim Status Document called for the preparation and submittal of an Operations Plan for hazardous waste treatment and storage at the Facility. The Operations Plan also required the inclusion of a Contingency Plan for the Facility and a formal written Closure Plan which is subject to approval of the Regional Water Quality Control Board.

On August 26, 1983, Trent Tube submitted the required formal Operations Plan for Hazardous Waste to the DOHS. The Operations Plan includes a written Closure Plan dated February 22, 1983, as an Appendix to that Report. A copy of that original Closure Plan is included as Appendix B of this Report.

The cover letter of that submittal, which is also included in Appendix B, specifically notified that Agency that the Fullerton Facility would close on or before December 31, 1983.

II. Revision of Closure Plan Prior to Actual Closure

From March 28-30, 1984, Mr. Richard W. Klippel, P.E., of Calocerinos & Spina, Consulting Engineers (C&S), and Robert Phillips of Trent Tube inspected the Plant and assisted Mr. Harry Murphy, Plant Manager, in updating and revising the Closure Plan and cost estimate. On March 29, 1984, Mr. Klippel and Mr. Phillips met with Mr. Kurt Burchtold of the Santa Ana Regional Water Quality Control Board to discuss the pending Plant closure and submittal of the notice and revised Closure Plan. Mr. Burchtold advised Trent Tube to submit the Plan to both the Water Quality Control Board and the DOHS.

On April 1, 1984, in accordance with provisions of Attachment A, Section V, of the Interim Status Document, the Revised Closure Plan and cost estimate were submitted by certified letter to the Santa Ana Regional Water Quality Control Board. As per Mr. Burchtold's recommendation, a copy of the Plan was sent to the DOHS. That Closure Plan identified the actual closure date of May 11, 1984.

On May 4, 1984, Trent Tube received a copy of a memo from the Regional Water Quality Control Board to the DOHS referring closure approval for the Facility to the DOHS. In that memo, the Regional Water Quality Board stated that no problems were noted during their inspection of the Facility or in their review of the Closure Plan, with one exception. That exception involved small areas of soil contaminated with waste oil which were noted on the south side of the Plant during their inspection. Their memo notes that the Plant Manager, Mr. Harry Murphy, stated that, during closure, the soil in those areas would be removed to a depth of 3 feet.

A copy of the Revised Closure Plan and the Regional Water Quality Control Board's letter are contained in Appendix C.

III. Actual Closure Activities

During April 1984 Trent Tube began to deactivate portions of their manufacturing operation and on May 11, 1984, the Firm ceased all manufacturing at the Facility. During this period, and throughout the remainder of May, the Company fully implemented all of the items referenced in the Closure Plan including:

1. Removal of all drums of waste solvents plus detergent cleaning wastes.
2. Removal of all remaining virgin solvents.
3. Removal of waste oils for recycling.

4. Washing and rinsing of the degreaser tank in the Building and disposal of the wash waters.
5. Neutralization and disposal of the pickling acids contained in tanks in the Building.
6. Dismantling and removal of the pickling tanks and exhaust ducts used to vent the tank.
7. Removal of ammonia and associated storage tanks by suppliers.
8. Removal and disposal of contaminated soil behind the Building as requested by the Regional Water Quality Control Board.

Table 1, attached, shows the various items removed for disposal and the transporter, disposal site and manifest number for each. Copies of all manifests are included in Appendix D, along with photos of the areas excavated.

IV. Closure Certification

On August 16, 1984, Mr. Richard Klippel under the direction of Mr. Frank Spina, California P.E. #39026, Partner, Calocerinos & Spina, Consulting Engineers, inspected the vacant and closed Facility and reviewed photographs, manifests and billing records pertaining to the closure activities. On August 29, 1984, Mr. Frank Spina, on the basis of Mr. Klippel's inspection, certified by letter that the Facility was closed in accordance with the Closure Plan dated April 1, 1984. A copy of that Closure Certification is enclosed as Appendix E. Since the August 16th letter was inadvertently sealed with Mr. Spina's New York seal, an additional certification with the California seal was provided on December 13, 1984.

V. Additional Cleanup Requirements

On December 12, 1984, Mr. Robert Phillips received a letter dated December 3, 1984, from the Facility Permitting Unit of the DOHS advising Trent Tube that the Closure Plan was inadequate and the subsequent Closure Certification

TABLE 1
DISPOSAL DESTINATION FOR HAZARDOUS ITEMS
FROM
TRENT TUBE CLOSURE, FULLERTON, CALIFORNIA

<u>Date of Disposal</u>	<u>Item</u>	<u>Quantity</u>	<u>Transporter</u>	<u>Disposal Site</u>	<u>Manifest No.</u>
3/13/84	Oily wash water	400 gals.	Kens Oil Co.	BKK Corp. West Covina	83170052
5/2/84	Oily wash water	300 gals.	Lakewood Oil Serv.	BKK Corp. West Covina	83318904
5/23/84	Contaminated soil	20 c.y.	J-Cal Trans.	BKK Corp. West Covina	83170053
5/23/84	Contaminated soil	20 c.y.	J-Cal Trans.	BKK Corp. West Covina	83170054
5/23/84	Contaminated soil	15 c.y.	Magee Bros. Trkg.	BKK Corp. West Covina	83432430
5/23/84	1,1,1-Trichlor and oil	3,000 gals.	Oil Process	Baron Blakeslee Corp.	83432428
5/25/84	Waste oil to recycling	160 gals.	Rutherford Pacific	Facet Energy	83326982
5/26/84	Neutralized pickling acid	2,100 gals.	Liquid Waste Management	Chemical Waste Management Kettleman City	83170055
5/29/84	Pickling tank and liner	10,000 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432433
5/29/84	Tank and residue	2,400 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432434
5/29/84	Tank, liner and residue	10,000 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432435
5/29/84	Oily wash water	500 gals.	United Pumping Service	BKK Corp. West Covina	83170056
5/30/84	Waste acids and adsorbant	800 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432440
5/30/84	1,1,1-Trichloroethane, oil	145 gals.	Industrial Waste Utilization	Baron Blakeslee Corp.	83432441
5/31/84	Misc. paints, solvents and adsorbants	3,600 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432442
5/31/84	Empty drums and residues	600 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432439

inappropriate. The letter directed that a written Site Assessment Plan, prepared by an independent engineer registered in the State of California, be submitted to their office by December 15, 1984. The letter further stated that the Plan must provide for sampling and chemical assessment of all areas which were excavated at the Direction of the Regional Water Quality Control Board and all other areas that could be contaminated with hazardous wastes. The Plan must identify all principals, including the analytical laboratory, and all other contractors used. The Plan should also include drawings, sketches and/or photographs necessary to fully describe areas of concern and should propose remedial actions that would be taken if found to be necessary.

On December 14, 1984, officials of Trent Tube, Calocerinos & Spina, and Wayne Smith, Esq., of Gibson, Dunn and Crutcher, Attorneys, met with Mr. Roy Thielking of the Facility Permitting Unit staff and discussed the matter in some detail. At that meeting, it was agreed that Trent Tube would proceed with the submittal of the Site Assessment Plan and the subsequent execution of the activities upon Plan approval. Since Trent Tube had a purchase offer for the property and considered time to be of the essence, they requested that Mr. Thielking publish the required public notice at the earliest opportunity. Furthermore, it was agreed that Trent Tube would attempt to complete the site evaluation procedure to the Department's satisfaction prior to the expiration of the required 45-day public comment period. Thus, by approximately February 1, 1985, closure certification could be accomplished thereby allowing closing on the sale of the property.

VI. Site Assessment

A Site Assessment Plan was prepared and transmitted to Mr. Thielking on December 18, 1984, under the signature and seal of Frank J. Spina, California P.E. #39026. The Assessment Plan, which is included as Appendix F, outlined a

plan for obtaining borings and analyses of soil samples during the period from December 26-28, 1984, and submittal of an Assessment Report by January 15, 1985, outlining any remediation deemed necessary.

The site assessment work began on December 26, 1984, under the overall direction of Mr. Andrew Diefendorf, CPG, of Calocerinos & Spina.

Mr. David Bramwell, CEG, of IT Corporation, Irvine, California, supervised the drilling activities of the subcontractor, Pioneer Drilling Company, and obtained the required boring samples for analysis. The samples were packed in ice and shipped by air express to California Analytical Services in Sacramento, California, where they were analyzed for suspected organics utilizing USEPA Methods 601 and 602. On-site readings of the soils at various locations were taken by Mr. Bramwell utilizing an organic vapor meter. The analytical results from the boring samples along with the organic vapor meter readings confirmed the presence of additional organic contamination at low levels near the rear of the Trent Tube Building and organic contamination at a much higher level near the back fence of the Trent Tube property adjacent to the paved Solvent Storage Area belonging to Vista Paint Company. Thus, further remediation of the site was judged to be necessary.

VII. Site Remediation Activities

On January 18, 1985, a Site Remediation Plan was submitted to Mr. Thiekling of DOHS under the signature and seal of Mr. Frank J. Spina. The Plan, which is contained in Appendix G, contains all of the boring logs and analytical results along with drawings detailing the limits of excavation of contaminated soil in several areas of the site.

In subsequent telephone conversations, Mr. Thielking verbally agreed with the recommended remediation steps but advised that he would have to have a letter of approval from the South Coast Air Quality Management District (SCAQMD) before he could give his formal approval.

On January 28, 1985, C&S provided the SCAQMD with a copy of the Site Remediation Plan and inquired as to the need for an Air Permit. A letter was also sent to Mr. Thielking advising him of our contact with SCAQMD and requesting written approval of the Remediation Plan from the DOHS.

On February 3, 1985, Trent Tube submitted an Application for an Excavation Permit along with an Excavation Plan narrative to SCAQMD and DOHS.

On February 7, 1985, Mr. Diefendorf of Calocerinos & Spina, Mr. Phillips of Trent Tube and Mr. Charles Templar of Industrial Waste Utilization met with Mr. Lettice of the SCAQMD in El Monte and were given an Excavation Permit letter with a list of permit conditions. Copies of the referenced correspondence and the Permit are enclosed as Appendix H.

On February 8, 1985, Mr. Diefendorf and Mr. Phillips met with Mr. Thielking to advise him of the issuance of the Air Permit and to request written approval to proceed with the remedial excavation work. While a letter was not given them, they left with a feeling that they had verbal approval of the Remediation Plan and could proceed with the excavation described in that Plan.

Excavation activities at the site therefore commenced on February 11, 1985, under the supervision of Mr. Diefendorf, C&S. A total of four truckloads (57 cubic yards) of contaminated soil were excavated and transported to the Casmalia Resources Landfill, Casmalia, California. Photos showing the excavation area and manifests for the four loads are contained in Appendix I.

Late Monday morning Mr. Diefendorf talked by phone with Mr. Thielking who informed him that a letter was being prepared requiring excavation of a much larger area of soil for shipment to disposal and also requiring submittal of a plan for investigating contamination between the Trent Tube fence and the large drainage channel behind the site.

With the uncertainty regarding the extent of work required, Trent Tube decided to halt any further excavation and seek clarification from the DOHS. The letter referenced by Mr. Thielking was received by Trent Tube on February 20, 1985. A copy of that letter is enclosed in Appendix J.

On February 21, 1985, representatives of Trent Tube, Colt Industries, Calocerinos & Spina, and Gibson, Dunn & Crutcher met with Mr. Thielking and Mr. Sneh of the DOHS to clarify the extent of the required excavation. Mr. Sneh stated that a closure certification would be granted to Trent Tube if they completed the work described in the Remediation Plan plus the additional on-site excavation as outlined in the February 20, 1985, letter. It was determined that the Closure Notification had been published in the newspaper and that no comments had been received during the 45-day notice period. Thus, the notification requirement had been fulfilled.

With that clarification Trent Tube resumed excavation at the site on February 25, 1985. Sixteen additional loads of contaminated soil were transported to the Casmalia Resources Landfill on February 25, 26 and 27, 1985. Manifests for the 16 loads are contained in Appendix K. The boundaries of the expanded excavation area are shown in Figure 9 in Appendix K.

Soils from Area B at the site, outside of the extended Area A, were removed to the designated area east of the building and spread in a thin layer for aeration. During the period of aeration, the warm (75°F) dry weather resulted in excellent drying of the material. Furthermore, the material was turned over during aeration to further enhance volatilization of the contaminants.

On February 28, 1985, 16 truckloads of clean fill material were backfilled into the excavated hole and compacted. On March 1, 1985, the aerated soil was removed from the aeration area and placed back in the excavation. The aerated soil comprises the top 2 feet of the entire area as shown in Figure 10 in

Appendix K. The Appendix also contains photographs showing the area after excavation, and after backfill and final grading.

Mr. Richard J. Kulibert, Hydrogeologist with Calocerinos & Spina, inspected the final excavation and backfilling operations from January 25 through March 1, 1985. Excavation work was performed by Industrial Waste Utilization and transportation of the waste was provided by J-Cal Transportation.

At this point in time, the site has been completely remediated in accordance with the Amended Plan approved by the California Department of Health Services, and a Certification to that effect is included in the transmittal letter for this Report.

Respectfully submitted,

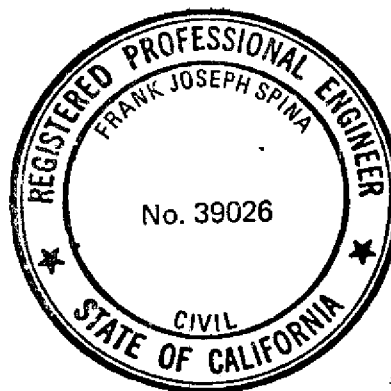
CALOCERINOS & SPINA

Frank J. Spina 2/11/85

Frank J. Spina, P.E.
Partner

FJS:RWK:mts

Enclosures



APPENDIX A

INTERIM STATUS DOCUMENT
AND
CLOSURE PROVISIONS

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET

SACRAMENTO, CA 95814



Facility: Trent Tube Division)
Fullerton Operation)
2100 East Orangethorpe)
Avenue)
Orange County)
Fullerton, CA 92634)

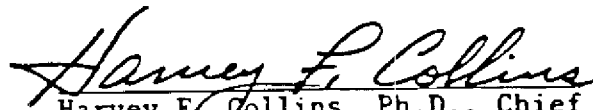
Operator: Trent Tube Division of)
Crucible, Inc.)
P.O. Box 3068)
Fullerton, CA 92634)

INTERIM STATUS DOCUMENT

Number: CAD 008325110

Effective Date: April 6, 1981

Pursuant to Section 25200.5 of the California Health and Safety Code, this Interim Status Document is hereby granted to Trent Tube Division of Crucible, Inc., subject to the conditions set forth in Attachment A which by this reference is incorporated herein.


Harvey F. Collins, Ph.D., Chief
Environmental Health Branch

V. CLOSURE

1. Closure.

The owner or operator shall close his facility in a manner that: (a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground water, or surface waters, or to the atmosphere.

2. Closure plan and amendment of plan.

(a) The owner or operator shall have a written closure plan. This plan shall be subject to approval by the California Regional Water Quality Control Board and shall be kept at the facility. This plan shall identify the steps necessary to close the facility completely at any point during its intended life and at the end of its intended life. The closure plan shall include, at least:

- (1) A description of how and when the facility will be partially closed, if applicable, and ultimately closed. The description shall identify the maximum extent of the operation which will be unclosed during the life of the facility, and how Item 1 and other applicable conditions of this document will be met;
- (2) An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility;
- (3) A description of the steps needed to decontaminate facility equipment during closure; and
- (4) A schedule for final closure which shall include, as a minimum, the anticipated date when wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. (For example, the expected date for completing treatment or disposal of waste inventory shall be included, as must the planned date for removing any residual wastes from storage facilities and treatment processes.)

(b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator shall amend his plan any time changes in operating plans or facility design affect the closure plan.

(c) The owner or operator shall submit his closure plan to the California Regional Water Quality Control Board at least 180 days before the date he expects to begin closure. The California Regional Water Quality Control Board will modify, approve, or disapprove the plan within 90 days of receipt and after providing the owner or operator and the affected public (through a newspaper notice) the opportunity to submit written comments.

3. Time allowed for closure.

(a) Within 90 days after receiving the final volume of hazardous wastes, the owner or operator shall treat all hazardous wastes in storage or in treatment, or remove them from the site, or dispose of them on-site, in accordance with the approved closure plan.

(b) The owner or operator shall complete closure activities in accordance with the approved closure plan and within six months after receiving the final volume of wastes. The California Regional Water Quality Control Board may approve a longer closure period under Item 2 (c) if the owner or operator can demonstrate that: (1) the required or planned closure activities will, of necessity, take him longer than six months to complete, and (2) that he has taken all steps to eliminate any significant threat to human health and the environment from the unclosed but inactive facility.

4. Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

5. Certification of closure.

When closure is completed, the owner or operator shall submit to the California Regional Water Quality Control Board certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

VI. FINANCIAL RESPONSIBILITY

1. Cost estimate for facility closure.

- (a) The owner or operator shall have a written estimate of the cost of closing the facility in accordance with the applicable closure requirements of this document. The owner or operator shall keep this estimate, and all subsequent estimates, at the facility. The estimate shall equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan.
- (b) The owner or operator shall prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.
- (c) On each anniversary of the effective date of this document, the owner or operator shall adjust the latest closure cost estimate using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its *Survey of Current Business*. The inflation factor shall be calculated by dividing the latest published annual Deflator by the Deflator for the previous year. The result is the inflation factor. The adjusted closure cost estimate shall equal the latest closure cost estimate (see Item 1(b)) times the inflation factor.

APPENDIX B

CLOSURE PLAN AND NOTIFICATION
SUBMITTED ON AUGUST 26, 1983

Colt Industries



WLM
Copy

Trent Tube Division
Crucible Inc
P. O. Box 3068
2100 East Orangethorpe
Fullerton, California 92634
714/526-5522

CAD 008325110

August 26, 1983

California State Dept. of Health Services
Hazardous Waste Management Branch
107 South Broadway, Room 7128
Los Angeles, California

Gentlemen:

Enclosed is our operation plan for hazardous waste,
treatment and storage at the Fullerton operation.

This letter will also serve as notice that this plant
will close on or before December 31, 1983. A closure plan
is incorporated as part of the operation.

Sincerely,

Harry L. Murphy

Harry L. Murphy
Manager of Quality Assurance

cc: C. Abend
D. Gehr
F. Hunter

NGSC-DTSC005031

OPERATION PLAN

FOR

HAZARDOUS WASTE

TRENT TUBE DIVISION
COLT INDUSTRIES
FULLERTON OPERATION

TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Page</u>
I	FACILITY INDENTIFICATION	1-1
II	FACILITY INFORMATION	2-1
	1. Maps	
	Topographic (1:24000 Scale)	2-2
	Topographic (1:2400 Scale)	2-3
	Wells, Surface Water & Aqueducts	2-4
	Treatment & Storage Areas	2-5
	Topographic, Facility Only, Drainage	2-6
	Roads, Internal to Facility	2-7
	Utility Lines	2-8
	2. Photographs of Facility	2-9
	3. Associated Information	2-13
III	GEOLOGY OF SITE (Not applicable to this plan.)	
IV	RELATIONSHIP OF FACILITY TO 100 YEAR FLOODPLAN	4-1
V	CHARACTERISTICS OF HAZARDOUS WASTES HANDLED	5-1
VI	FACILITY WASTE MANAGEMENT DEVICES	6-1
VII	FACILITY EQUIPMENT & DEVICES	7-1
VIII	OPERATIONAL PROCEDURES	8-1
IX	PERSONNEL	9-1
X	EMERGENCY PROCEDURES (Refer to attached "Emergency/ Contingency Plan" Appendix A)	
XI	ENVIRONMENTAL CONTROL PERMITS	11-1
XII	RECORDS & REPORTS	12-1
XIII	CLOSURE (Refer to attached "Closure Plan" Appendix B)	
XIV	FINANCIAL RESPONSIBILITY	14-1

CLOSURE PLAN AND COST ESTIMATES
FOR HAZARDOUS WASTE FACILITIES

FACILITY: Trent Tube Division, Fullerton Operation
2100 East Orangethorpe Avenue
Orange County
Fullerton, California 92634

OPERATOR: Trent Tube Division of Crucible, Inc.
P.O. Box 3068
Fullerton, California

FACILITY ID NO.: CAD 008325110

FACILITY PHONE NO.: (714) 526-5522

I. GENERAL

- A. This plan is prepared in compliance with the California Department of Health Services, Interim Status Document for the Fullerton facility, Section V, dated April 6, 1981.
- B. This plan is to be submitted for approval to the California Regional Water Quality Board at least 180 days prior to the facility closure for a period exceeding 90 days.

II. WASTE INVENTORY

A. Pickle Liquor - EPA Number K062

- (1) Contained in two process tanks of 2000 gallons each. Maximum volume at closure, 4000 gallons total.
- (2) Waste is neutralized prior to disposal in a class 1 landfill.

B. 1,1,1 Trichloroethane Waste - EPA Number F001

- (1) Waste is contained in 55 gallon drums. Maximum capacity is 15 drums.
- (2) Process fluid is contained in a process tank of 2400 gallons maximum capacity.

C. Waste Mineral Spirits & Kerosene

- (1) Contained in 55 gallon drums.
- (2) Maximum capacity of 3 drums at closure.

D. Waste Oil - EPA Number NA

- (1) Contained in 10-20 gallon resevoirs at each of six draw benches.
- (2) Maximum storage capacity is 200 gallons bulk waste plus the resevoir at each draw bench.

E. Caustic Cleaning Wastes - EPA Number NA

- (1) Contained in a steel storage tank of 200 gallons maximum capacity.
- (2) Neutralization is required before disposal in a class 1 landfill.

III. FACILITY DECONTAMINATION STEPS

A. Acids & Caustics

- (1) Neutralize these solutions (ph 6/8).
- (2) Have solutions pumped to a bulk tank truck.
- (3) Water rinse all tanks.
- (4) Transfer rinse solution to the bulk tank truck.
- (5) Arrange for disposal in class 1 landfill.

B. Waste Oil

- (1) Transfer from bench resevoirs to storage tank then to bulk truck with a vacuum system.
- (2) Water rinse and pump solution to bulk tank truck.
- (3) Arrange for disposal in class 1 landfill.

C. 1,1,1 Trichloroethane, Mineral Spirits & Kerosene

- (1) Arrange for a reclaimer to pick up and remove material from premises.

IV. CLOSURE SCHEDULE

- A. Wastes will no longer be generated after 15 days of closure.
- B. Wastes will be treated and/or removed from the facility within 30 days of closure.

V. COST ESTIMATES FOR FACILITY CLOSURE

A. Pickle Liquor

- | | |
|--|----------|
| (1) Neutralize and clean tanks, labor 8 hours @ \$18/hr. | \$144.00 |
| (2) Vacuum truck service | 850.00 |
| (3) Dump fee - 18 tons @ \$4/ton | 72.00 |

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

B. Caustic & Oil Wastes

(1) Transfer oil from draw benches, labor 8 hours @ \$18/hr.	\$144.00
(2) Neutralize caustic tank, labor 1 hour @ \$18/hr.	18.00
(3) Vacuum truck service	85.00
(4) Dump fee 1.6 tons @ \$4/ton	7.00

C. 1,1,1 Trichloroethane, Mineral Spirits & Kerosene

(1) Labor eight hours @ \$18/hr.	<u>144.00</u>
----------------------------------	---------------

Subtotal \$1464.00

D. Administration & Contingencies

(1) Administration (including supervision and paperwork).	316.00
(2) Contingencies (15% of \$1464).	<u>220.00</u>

Total cost of closure \$2000.00

VI. CERTIFICATION OF CLOSURE

A. Trent Tube and an independent registered professional engineer shall submit to the California Regional Water Quality Board certification that the facility has been closed and wastes removed in accordance with specifications of the CRWQB approved plan.

Prepared by:

Harry L. Murphy

Feb 22, 1983
Date

cc: H. Murphy
C. Abend
R. Holmes
J. Pawlowski
M. Short
S. Cornell
D. Gehr
R. Haak

APPENDIX C

REVISED CLOSURE PLAN AND COMMENT LETTER
FROM REGIONAL BOARD



April 1, 1984

Regional Water Quality Control Board
Santa Ana Region
6809 Indiana Avenue, Suite 200
Riverside, California 92506

Attention: James Anderson, Executive Officer

Reference: Facility Closure - CAD 008325110

Gentlemen:

In accordance with provisions of our interim status document number CAD 008325110 effective April 6, 1981, the Trent Tube Division hereby formally submits notification of its intent to close its manufacturing facility at 2100 East Orangethorpe Avenue, Fullerton, California, 92634, and hereby transmits for the record, a copy of our latest revised closure plan for the subject facility as required by Section V paragraph 2 (c) of that document.

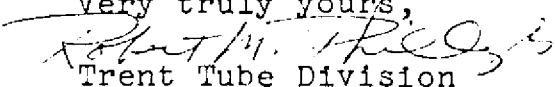
In accordance with Section 1 (d) of the referenced interim status document, the owner notified the California State Department of Health Services of the proposed closure of the facility by certified letter on August 26, 1983, a copy of which is attached for reference.

The company plans to discontinue manufacturing operations at the subject facility on Friday, May 11, 1984, and to proceed at that time with the schedule of activities contained in the attached closure plan.

In accordance with discussions on March 29, 1984, between myself and consultant Mr. Klippel of Calocerinos & Spina, and Mr. Berchtold of your staff, we look forward to the expeditious review offered by your agency and trust that you will promptly advise us of any deficiencies noted in the closure document. Enclosed per Mr. Berchtold's request is a copy of the Facilities Operating Plan as submitted to the Department of Health Services on August 26, 1984.

Thank you for your assistance in this matter and please do not hesitate to call if you have any questions or need additional information.

Very truly yours,


Trent Tube Division
Crucible Materials Corp.

cc: Dept. of Health Services
Hazardous Waste Management Board

CLOSURE PLAN AND COST ESTIMATES
FOR HAZARDOUS WASTE FACILITIES

FACILITY: Trent Tube Division, Fullerton Operation
2100 East Orangethorpe Avenue
Orange County
Fullerton, California 92634

OPERATOR: Trent Tube Division
Crucible Materials Corporation
P.O. Box 3068
Fullerton, California 92634

FACILITY ID NO.: CAD 008325110

FACILITY PHONE NO.: (714) 526-5522

I. GENERAL

- A. This plan is prepared in compliance with the California Department of Health Services, Interim Status Document for the Fullerton facility, Section V, dated April 6, 1981.
- B. This plan is to be submitted for approval to the California Regional Water Quality Board (CRWQB) prior to closure.

The local board is located at:

6809 Indiana Street
Suite 200
Riverside, California

Attention: Mr. James Anderson
Executive Officer
714/684-9330

II. WASTE INVENTORY

A. Pickle Liquor - EPA Number KO62

- (1) Contained in two process tanks of 2000 gallons each.
Maximum volume at closure, 4000 gallons total.
- (2) Waste is neutralized prior to disposal.

B. 1,1,1 Trichloroethane Waste - EPA Number F001

- (1) Waste is contained in 55 gallon drums. Maximum storage capacity is 15 drums.
- (2) Solvent used during manufacturing is contained in a degreaser unit having a maximum capacity of 2400 gallons.

C. Waste Mineral Spirits & Kerosene

- (1) Contained in 55 gallon drums.
- (2) Storage capacity at closure is 8 drums.

D. Waste Oil - EPA Number NA

- (1) Contained in 10/20 gallon reservoirs at each of six draw benches.
- (2) Maximum storage capacity is 200 gallons bulk waste plus the reservoir at each draw bench.

E. Dilute Detergent Cleaning Wastes - EPA Number NA

- (1) Contained in a steel storage tank 200 gallons maximum capacity.

III. FACILITY DECONTAMINATION STEPS

A. Pickle Liquor Facilities

- (1) Neutralize pickling acids with ammonia as per operating plan.
- (2) Pump neutralized solutions to bulk tank truck.
- (3) Manifest solutions for treatment and disposal.
- (4) Dismantle and cut up nitric-HF pickle tank and exhaust intakes inside building.
- (5) Manifest contaminated equipment for disposal.
- (6) Arrange with supplier to remove ammonia storage tanks and vent ammonia feed system.

B. 1,1,1 Trichloroethane Facilities

- (1) Arrange with reclaimer to pump out degreasing tank, recovery still equipment and 55 gallon drums of still bottoms.
- (2) Arrange with reclaimer to haul off remaining quantities of virgin solvent in outside storage tanks.

- (3) Rinse degreasing tank and recovery still system with detergent and water pump detergent solution to bulk tank truck for disposal.
- (4) Manifest solvent and cleaning solution for disposal.
- (5) Arrange with vendor for removal of vertical storage tank.
- (6) Clean and ventilate remaining horizontal storage tank.

C. Mineral Spirit and Kerosene Facilities

- (1) Arrange with reclaimer to pump out 55 gallon drums.
- (2) Clean impound areas with detergent solution.
- (3) Transfer cleaning solution to the 200 gallon storage tank.
- (4) Manifest mineral spirits and kerosene for disposal by recycling.

D. Waste Oil Facilities

- (1) Transfer oil from draw bench reservoirs to 200 gallon storage tank.
- (2) Rinse draw bench reservoirs and pump system with detergent solution.
- (3) Transfer detergent solution to storage tank.
- (4) Arrange for disposal of waste oil from 200 gallon storage tank.
- (5) Rinse out 200 gallon storage tank with detergent.
- (6) Rinse out oily waste impound area with detergent.

E. Detergent Cleaner Solution Disposal

- (1) Pump out 200 gallon storage tanks (2) and impound area into tank truck.
- (2) Manifest cleaning solutions for proper disposal.

F. Empty Drum Disposal

- (1) Arrange for drum reprocessor to pick up reusable drums.
- (2) Crush unusable drums and manifest for disposal.

IV. CLOSURE SCHEDULE

- A. After suspension of manufacturing operations, additional wastes due to clean-up operations, etc. will be generated for a maximum of thirty (30) days.
- B. Upon suspension of manufacturing operations, all wastes will be treated within forty (40) days and removed from the premises within sixty (60) days.

V. COST ESTIMATES FOR FACILITY CLOSURE

A. Pickle Liquor and Facilities

- | | |
|---|-------------|
| (1) Labor costs for neutralization of acids and cleaning and removal of tank and exhaust system. 60 hours @ \$18/hr. | \$1060 |
| (2) Transportation, treatment, and disposal of 4000 gallons of neutralized pickle liquor. (4000 gal.) X (8.34 #/gal.) X (125/ton) ÷ (2000 #/gal.) | 2085 |
| (3) Transportation and disposal of pickle tank and exhaust system. | <u>1200</u> |

Subtotal \$4365

B. 1,1,1 Trichloroethane Facilities

- | | |
|--|------------|
| (1) Labor costs for cleaning tanks. 24 hours @ \$18/gal. | 432 |
| (2) Credit for recovered solvent. 2000 gal. @ \$.60/gal. | (1200) |
| (3) Disposal of detergent rinse solution. | <u>400</u> |

Subtotal - Credit (\$368)

C. Mineral Spirits and Kerosene Facilities

- | | |
|------------------------------------|---------|
| (1) Credit for solvent recoveries. | (\$125) |
|------------------------------------|---------|

Subtotal - Credit (\$125)

D. Waste Oil Facilities

- | | |
|---|------------|
| (1) Labor to transfer oil from draw benches to waste oil tank, clean oil reservoirs, storage tank and impound area. 24 hours @ \$18/hr. | \$432 |
| (2) Transportation and disposal of waste oil. | <u>400</u> |

Subtotal \$832

E. Detergent Cleaning Solution Disposal

- | | |
|----------------------------------|--------------|
| (1) Transportation and disposal. | <u>\$400</u> |
|----------------------------------|--------------|

Subtotal \$400

F. Empty Drum Disposal

(1)	Cleaning of reusable drums by drum processor. \$10 each X 20 drums	\$200
(2)	Crushing and disposal of non-reusable drums. \$15 X 15 drums	<u>225</u>
	Subtotal	\$425

G. Administration Consultant Services & Contingencies

(1)	Administration and supervision	\$3000
(2)	Professional engineer recommendations, inspection and certification.	5000
(3)	Contingencies	<u>2000</u>
	Subtotal	\$10,000

H. Total Estimated Closure Cost - 4/2/84 \$15,529

April 4, 1984
Date

Harry L. Murphy
Harry L. Murphy
Plant Manager

Memorandum

Angelo Bellomo, Regional Administrator
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, CA 90012

Date: May 4, 1984

From : California Regional Water Quality Control Board—Santa Ana Region
6809 INDIANA AVENUE, SUITE 200, RIVERSIDE, CA 92506 (ATSS) 632-4130

Subject: TRENT TUBE DIVISION (CAD 008325110) CLOSURE PLAN

We have received a closure plan for the Trent Tube Division Facility in Fullerton (a copy was sent to your office). It is our understanding that for storage facilities your office has approval authority for closure plans. We therefore are referring this matter to you for review.

We have, however, reviewed the plan and inspected the facility with respect to its impact on water quality. During the inspection, small areas of soil contaminated with waste oil were noted on the south side of the plant. Mr. Harry Murphy, Plant Manager, stated that soil in these areas will be removed to a depth of three feet during closure. This is not included in the closure plan.

With the above exception, no problems were noted during the inspection or in our review of the closure plan as submitted. If you have any questions on this matter, please contact Kurt Berchtold of my staff.

Original Signed by

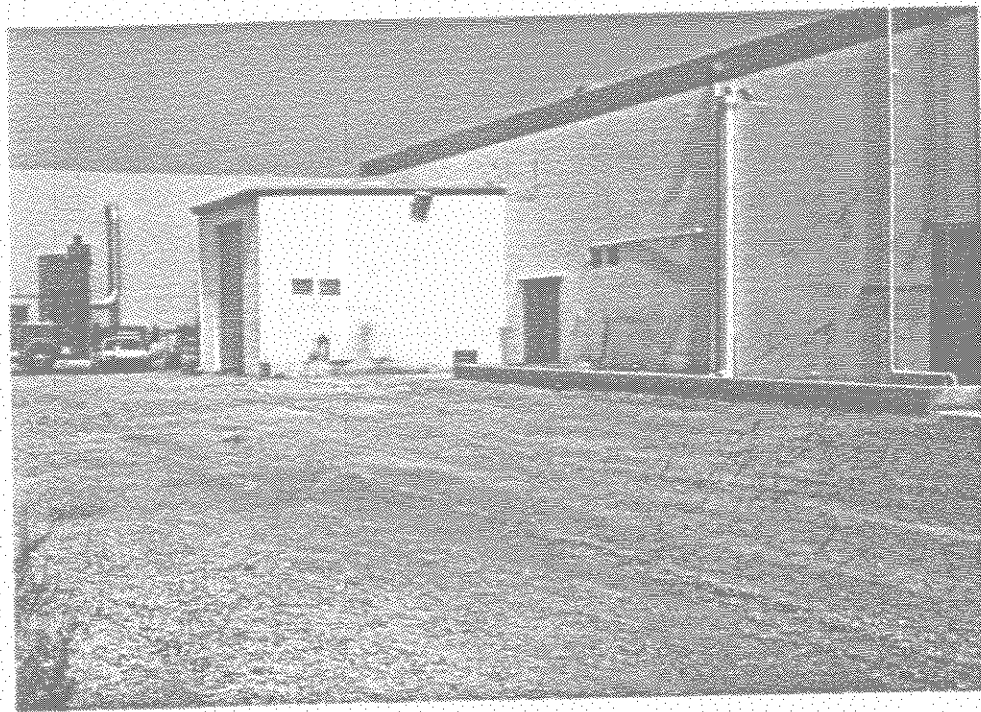
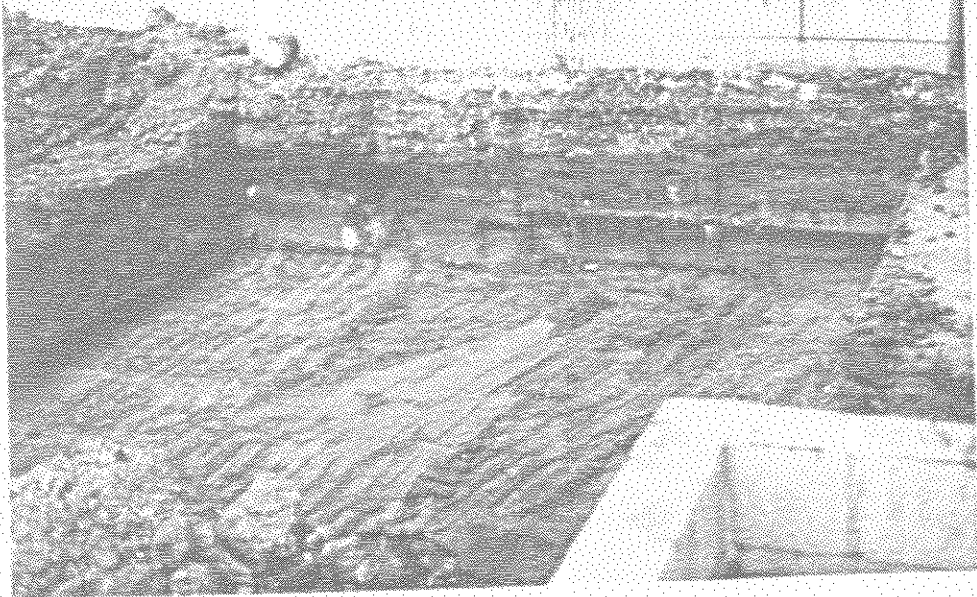
JAMES W. ANDERSON
Executive Officer

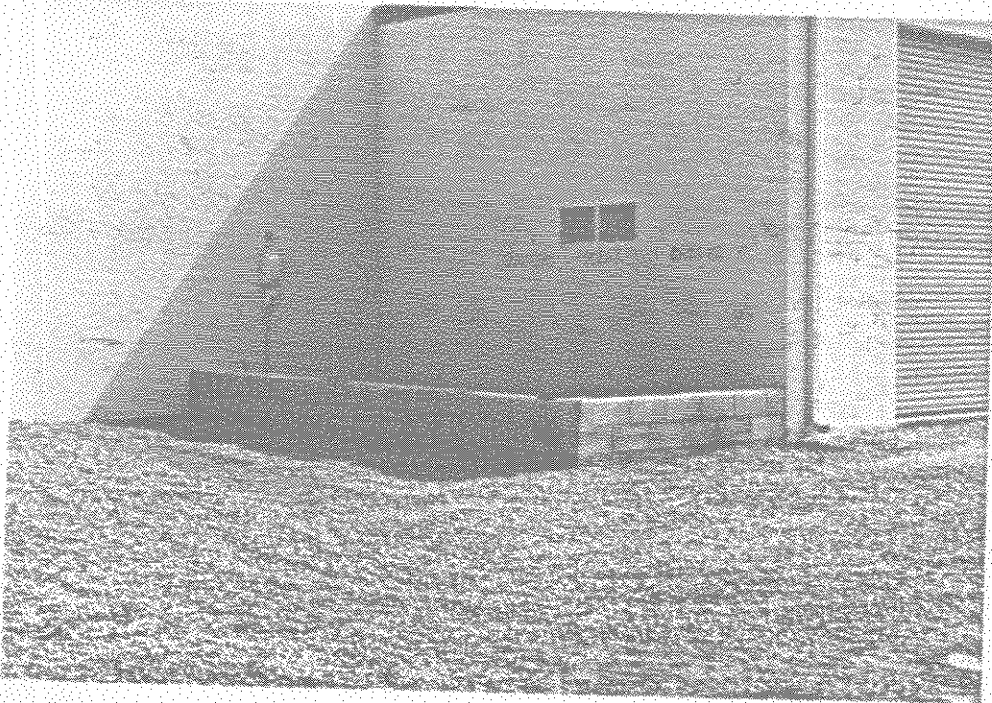
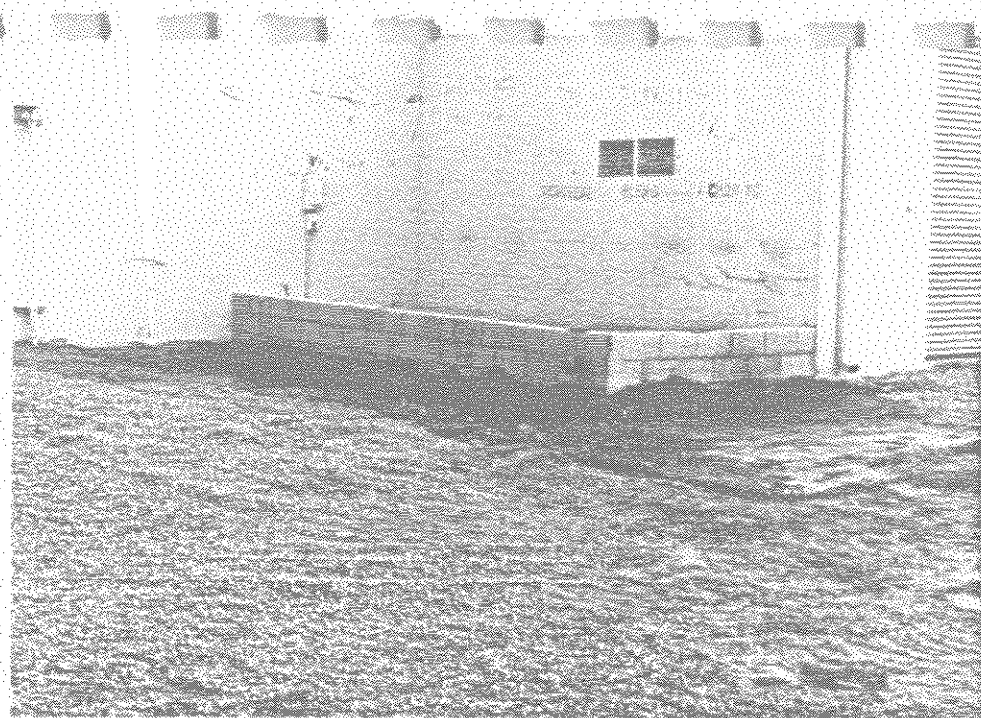
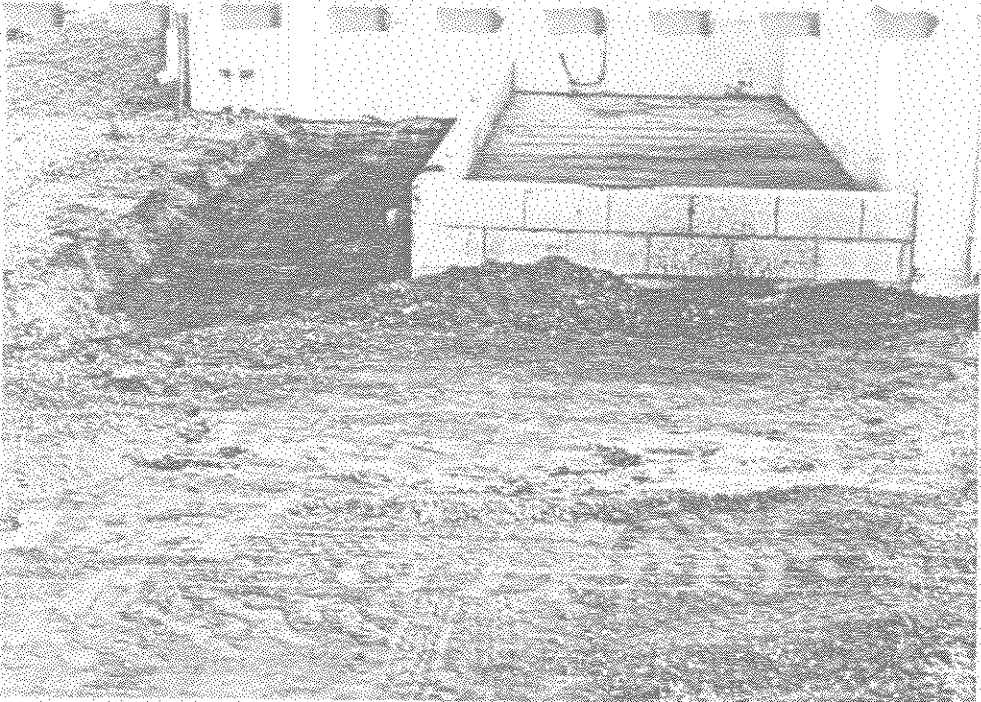
cc: Robert M. Phillips, Trent Tube Division
Harry Murphy, Trent Tube Division
Fred Lercari, SWRCB - DTS

KVB:kyb

APPENDIX D

PHOTOS OF EXCAVATED AREAS AND
MANIFEST FORMS SHOWING DISPOSAL OF MATERIALS SHIPPED
DURING INITIAL CLOSURE - MARCH-MAY 1984





UNIT BRANCH

UNIFORM HAZARDOUS WASTE MANIFEST

Department of Health Services

E type (12 characters per inch)

77 250

STATE ID NUMBER 83170052

NAME AND MAILING ADDRESS

TRENT TUBE DIV. - COLT IND.
2100 E. ORANGETHORPE AVE
FULLERTON, CA 92634

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CAD083251100000V

AREA CODE/PHONE NUMBER

714-526-5522

TRANSPORTER NO. 1

KEN'S OIL CO. PO Box 1239
GARDEN GROVE, CA
714-534-8841

VEH/CONTAINER NO.

EPA ID NUMBER

00104131607

9659
CAD0832511392

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BKK
2210 S AZUSA
WEST COVINA, CA 91791
AREA CODE/PHONE NUMBER 213-965-0911

EPA ID NUMBER

CAD067786749

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBER

TOTAL
QUANTITY

UNIT
WT/VOL

CONTAINER
NO. TYPE

WASTE
CAT. NO. METH

WATER + OIL

NA 1270

400 G 001CT 22203

COMPONENTS

CONC. RANGE
UPPER LOWER

UNITS
% PPM

95% WATER

95

90

X

5% OIL

10

5

X

SPECIAL HANDLING INSTRUCTIONS

WEAR RUBBER GLOVES + GOGGLES

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY
Harry L. Murphy

MO. 03

DAY 13

YR. 84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

Ken Kingman
Ken Kingman

DATE REC'D & ACCEPTED

MO. 13

DAY 13

YR. 84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE REC'D & ACCEPTED

MO. 1

DAY 1

YR. 1

DISCREPANCY INDICATION SPACE

00264

1.25

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number.

See instructions

Ken Sager
Ken Sager

EPA ID NUMBER

CAD067786749

DATE RECEIVED & ACCEPTED

MO. 03

DAY 27

YR. 84

TO BE FILLED IN BY GENERATOR

TO BE FILLED IN BY TRANSPORTER

TO BE FILLED IN BY TSDF

UNIFORM HAZARDOUS WASTE MANIFEST

STATE ID NUMBER

83318904

Please print or type with ELITE type (12 characters per inch).

GENERATOR NAME AND MAILING ADDRESS

TRENT TIRE DIV - COLT IND.
2100 E. CHANETHOPE AVE
FRESNO, CA 93724
AREA CODE/PHONE NUMBER 514-531-5522

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CAD008325110000V

TRANSPORTER NO. 1

Lakeview Oil Service
13579 Whittier Ave
Fontana, Calif.

VEH./CONTAINER NO.

EPA ID NUMBER

010R4471618 CAD008672780E

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH./CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

VEK Corp
2210 Azusa Ave
Azusa, Calif.
AREA CODE/PHONE NUMBER 626-765-0911

EPA ID NUMBER

CAD00617286121VE

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBER

TOTAL
QUANTITY

UNIT
WT/VOL

CONTAINER
NO. TYPE

WASTE
CAT. NO. DISF
METH

WATER - OIL

NA 119

300 GAL

021CT

2220

(Heavy metal content, NQ5.)

COMPONENTS

CONC. RANGE
UPPER LOWER

UNITS

% PPM

EOH

85

X

157

25

X

57

10

X

SPECIAL HANDLING INSTRUCTIONS

Fuller, James - 2/2/84

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L MURPHY

MO.

DAY

YR.

05

02

84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Glenn M. M. V.

Printed or typed full name and signature

DATE
REC'D
&
ACCEPTED

MO.

DAY

YR.

05

02

84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE
REC'D
&
ACCEPTED

MO.

DAY

YR.

05

02

84

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number. See instructions.

Printed or typed full name and signature

EPA ID NUMBER

DATE RECEIVED & ACCEPTED

MO.

DAY

YR.

05

02

84

TO BE FILLED IN BY GENERATOR

TO BE FILLED IN BY TRANSPORTER

TO BE FILLED IN BY TSDF

WASTE MANAGEMENT BRANCH

UNIFORM HAZARDOUS WASTE MANIFEST

STATE ID NUMBER **83170053**

Type with ELITE type (12 characters per inch).

GENERATOR NAME AND MAILING ADDRESS

Trent Tube Company
2100 E. Orangethorpe Avenue
Fullerton, CA 92634

77250
714-526-5522

AREA CODE/PHONE NUMBER

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CIAID 010 813 251110

TRANSPORTER NO. 1

U.S. 4 TRANS
P.O. Box
912 LYNWOOD CA

VEH/CONTAINER NO.

EPA ID NUMBER

00052585CA0980814888

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BKK
2210 S. AZUSA AVENUE
WEST COVINA, CA 91791

213-965-0916

AREA CODE/PHONE NUMBER

EPA ID NUMBER

CAD0677867415

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBER

TOTAL
QUANTITY

UNIT
WT/VOL

CONTAINER
NO. TYPE

WASTE
CAT. NO. METH

1.0 Hazardous Waste Solid Nos. ORM - E

HA9189

20 Y

001D161103

COMPONENTS

CONC. RANGE
UPPER LOWER

UNITS
% PPM

CONTAMINATED SOIL

99% 97% X

OIL

2% 1% X

KEROSENE

1% 1% X

SODIUM HYDROXIDE

2% 1% X

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY
Harry L. Murphy

MO.
05

DAY
23

YR.
84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

John L. Wallberg

John L. Wallberg

DATE
REC'D
&
ACCEPTED

MO.
05

DAY
23

YR.
84

Printed or typed full name and signature

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

DATE
REC'D
&
ACCEPTED

MO.

DAY

YR.

Printed or typed full name and signature

DISCREPANCY INDICATION SPACE

Facility owner or operator. Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD Facility must complete waste number.

DATE RECEIVED & ACCEPTED

EPA ID NUMBER

MO.

DAY

YR.

LAYENBERG
Layenberg

CAD067786749

05

23

84

Printed or typed full name and signature

TSD F RETAINS

HAZARDOUS WASTE MANAGEMENT BRANCH

UNIFORM HAZARDOUS WASTE MANIFEST

Sacramento, CA 95814

STATE ID NUMBER 83170054

Please print or type with ELITE type (12 characters per inch).

GENERATOR NAME AND MAILING ADDRESS

Trent Tube Company
2100 E. Orangethorpe Avenue
Fullerton, Ca 92634

714-526-5522

AREA CODE/PHONE NUMBER

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

TRANSPORTER NO. 1

J. CAL TRANS
P.O. BOX 912
LYNWOOD, CA

VEH/CONTAINER NO.

EPA ID NUMBER

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BKK
2210 S. AZUSA AVENUE
WEST COVINA, CA 91791

213-965-0916

AREA CODE/PHONE NUMBER

EPA ID NUMBER

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBERTOTAL
QUANTITYUNIT
WT/VOLCONTAINER
NO. TYPEWASTE DISP
CAT. NO. METH

1.0 HAZARDOUS WASTE SOLID NOS. DRM - E

NA 9189

210 Y

001 DT 611 03

COMPONENTS

CONC. RANGE
UPPER LOWERUNITS
% PPM

CONTAMINATED SOIL

99% 97%

OIL

2% 1%

KEROSENE

1% .1%

SODIUM HYDROXIDE

2% 1%

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L MURPHY
Harry L MurphyMO. DAY YR.
05 23 84☐ Check if continuation sheet is used Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

John Wallberg John Wallberg

DATE
REC'D
&
ACCEPTEDMO. DAY YR.
05 23 84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

VOID HARRY L MURPHY
Harry L MurphyDATE
REC'D
&
ACCEPTEDMO. DAY YR.
05 23 84

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number.

Printed or typed full name and signature

John Wallberg

DATE RECEIVED & ACCEPTED

MO. DAY YR.
05 23 84

Agency
MANAGEMENT BRANCH

UNIFORM HAZARDOUS WASTE MANIFEST

STATE ID NUMBER: **83432430**

GENERATOR NAME AND MAILING ADDRESS

Front Tube
2100 E. Grangerhays
Fullerton, Ca 92630

AREA CODE/PHONE NUMBER

TRANSPORTER NO. 1

714-926-3522 **TRK**

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

2210 S. Arroyo Avenue
West Covina, Ca 91791

AREA CODE/PHONE NUMBER

PROPER U.S. DOT SHIPPING NAME AND HAZARD CLASS

2.0 Hazardous Waste Solid Res

UN/NA NUMBER

HA9122

TOTAL QUANTITY

15

UNIT WT/VOL

2Y

CONTAINER NO. TYPE

001 BT 4210

WASTE DISPOSITION

001 BT 4210

CONTAMINATED SOIL

OIL

KEROSENE

SODIUM HYDROXIDE

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY
Harry L. Murphy

MO. **05** DAY **23** YR **84**

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

HOLLIS MAGEE
Hollis Magee

DATE REC'D

05

MO.

05

DAY

23

YR

84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE REC'D

05

MO.

05

DAY

23

YR

84

DISCREPANCY INDICATION SPACE

Facility owner or operator Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number.

Printed or typed full name and signature

JOHN A. ...
JOHN A. ...

EPA ID NUMBER

DATE RECEIVED & ACCEPTED

MO.

05

DAY

23

YR

84

TO BE FILLED IN BY GENERATOR

TO BE FILLED IN BY TRANSPORTER

TO BE FILLED IN BY TSD

UNIFORM HAZARDOUS WASTE MANIFEST

STATE ID NUMBER **83432428**

GENERATOR NAME AND MAILING ADDRESS

Trent Tube
2100 E. Grangerthorpe
Fallerton, Ca 92634

AREA CODE/PHONE NUMBER

714-526-5522

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CAD00083251110

TRANSPORTER NO. 1

Oil Process
5756 Alba
Los Angeles, Ca 90038

213-385-5063

VEH/CONTAINER NO.

EPA ID NUMBER

2Y8V CAD/SC060625C

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

Baron Makalee
525 E. Alondra
Gardena, Ca 90248

213-532-0730

AREA CODE/PHONE NUMBER

EPA ID NUMBER

CAD00974651132

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA NUMBER

TOTAL QUANTITY

UNIT WT/VOL

CONTAINER NO. TYPE

WASTE CAT. NO. DISP METH

1.0 1,1,1 Trichloroethane

ORM - A

UN 2831

3000

G

001 CIT

211 C

COMPONENTS

CONC RANGE

UNITS

1.0 1,1,1 Trichloroethane

95

85

X

1.1 Oil

5

3

X

6 # 26203

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature **HARRY L. MURPHY**
Harry L. Murphy

☐ Check if continuation sheet is used. Number of continuation sheets

MO **05** DAY **23** YR **84**

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature **Pat Owens**

DATE REC'D & ACCEPTED

MO **5** DAY **23** YR **84**

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE REC'D & ACCEPTED

MO DAY YR

DISCREPANCY INDICATION SPACE

Facility owner or operator certifies that the above hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number.

Printed or typed full name and signature **MICHAEL Childs**
Michael Childs

EPA ID NUMBER

DATE RECEIVED & ACCEPTED

CAD00974651132 MO **05** DAY **23** YR **84**

TO BE FILLED IN BY GENERATOR

TO BE FILLED IN BY TRANSPORTER

TO BE FILLED IN BY TSD

814

Type with ELITE type (12 characters per inch).

STATE ID NUMBER

83326982

GENERATOR NAME AND MAILING ADDRESS

TRENT TUBE DIV - CRUCIBLE OPER. CORP.
P.O. BOX 3068
FULLERTON, CA. 92634 (714) 526-5522

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

AREA CODE/PHONE NUMBER

TRANSPORTER NO. 1

Rutherford / Pacific
3000 Orange Ave
Long Beach Ca 90807 213-945-9461

VEH/CONTAINER NO.

EPA ID NUMBER

0000131600

CA109181017017013

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

Facet Energy
3000 Orange Ave
Long Beach Ca 90807 213-595-7333

EPA ID NUMBER

AREA CODE/PHONE NUMBER

CA109181017017013

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBER

TOTAL
QUANTITY

UNIT
WT/VOL

CONTAINER
NO. TYPE

WASTE
CAT. NO. MET

WASTE OIL - COMBUSTIBLE NOS.

NA1270

1160

Gal

0011 CT

2210

COMPONENTS

CONC. RANGE
UPPER LOWER

UNITS
% PPM

Recyclable oil

100

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY
Harry L. Murphy

MO.

DAY

YR.

05

25

84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Kevin McCusker

Printed or typed full name and signature

Kevin McCusker

DATE
REC'D
&
ACCEPTED

MO.

DAY

YR.

05

25

84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

DATE
REC'D
&
ACCEPTED

MO.

DAY

YR.

Printed or typed full name and signature

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number. See instructions.

Printed or typed full name and signature

Michael Mayer
Michael Mayer

EPA ID NUMBER

MO.

DAY

YR.

05

25

84

UNIFORM HAZARDOUS WASTE MANIFEST

STATE ID NUMBER 83170055

Please print or type with ELITE type (12 characters per inch).

TSDf SENDS THIS COPY TO GENERATOR WITHIN 15 DAYS

NGSC-DTSC005055

GENERATOR'S WASTE MATERIAL PROFILE SHEET

SFO D 78619
TSOR

A GENERAL INFORMATION

GENERATOR NAME TRENT TUBE DIV. - CRUCIBLE CO. CORP. TRANSPORTER LIQUID WASTE MANAGEMENT
 FACILITY ADDRESS 2100 E. ORANGETHORPE AVE TRANSPORTER PHONE 800-824-3345
FULLERTON CA 92634 GENERATOR USEPA I.D. CAD008325110
 TECHNICAL CONTACT H.L. MURPHY GENERATOR STATE I.D. SAME
 TITLE QA MGR PHONE 714-536-5522
 NAME OF WASTE NEUTRALIZED NITRIC ACID
 PROCESS GENERATING WASTE PICKLING OF STAINLESS STEELS

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR GREEN ODOR ☒ NONE TO ☒ MILD
☐ STRONG DESCRIBE AMMONIA
 PHYSICAL STATE @ 70°F ☐ SOLID ☐ SEMI SOLID ☒ LIQUID ☐ POWDER
 LAYERS ☐ MULTILAYERED ☒ BI-LAYERED ☐ SINGLE PHASED
 FREE LIQUIDS ☒ YES ☐ NO VOLUME 100 %
 pH: ☐ < 2 ☐ 7.1-10 ☐ N/A SPECIFIC GRAVITY ☐ < .8 ☐ 1.3-1.4 ☐ > 200°F ☐ CLOSED CUP
☐ 2-4 ☐ 10.1-12.5 ☐ .8-1.0 ☐ 1.6-1.7 ☐ 70°F-100°F ☒ NO FLASH ☐ OPEN CUP
☒ 4.1-6.9 ☐ > 12.5 ☒ 1.1-1.2 ☐ > 1.7 ☐ 101°F-139°F ☐ EXACT ☐ FLASH POINT
☐ 7 ☐ EXACT ☐ EXACT ☐ 140°F-200°F

C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

TOTAL CHROMIUM 0.245
NICKEL 0.225
IRON 0.458
FLUORIDE 1.58
AMMONIA 2.14
AMMONIUM FLUORIDE 3.09
BALANCE H2O

D METALS

☐ TOTAL (PPM) ☒ EPA EXTRACTION PROCEDURE (mg/L)
 ARSENIC (As) ☐ SELENIUM (Se) ☐
 BARIUM (Ba) ☐ SILVER (Ag) ☐
 CADMIUM (Cd) ☐ COPPER (Cu) ☐
 CHROMIUM (Cr) 2940 NICKEL (Ni) 2700
 MERCURY (Hg) ☐ ZINC (Zn) ☐
 LEAD (Pb) ☐ THALLIUM (Tl) ☐
 CHROMIUM HEX (Cr + 6) 360 EST. IRON 5496

E OTHER COMPONENTS - TOTAL (PPM)

CYANIDES -0- PCB'S -0-
 SULFIDES -0- PHENOLICS -0-

F SHIPPING INFORMATION

D.O.T. HAZARDOUS MATERIAL? ☒ YES ☐ NO
 PROPER SHIPPING NAME HAZARDOUS WASTE LIQUID NPS
 HAZARD CLASS ORM-E I.D. NO. NA9189 RQ ☐
 METHOD OF SHIPMENT ☒ BULK LIQUID ☐ BULK SOLID
☐ DRUM (TYPE/SIZE) ☐
 ANTICIPATED VOLUME 3500 GALS. ☐ CUBIC YARDS
☐ OTHER ☐
 PER ☒ ONE TIME ☐ WEEK ☐ MONTH
☐ QUARTER ☐ YEAR ☐

G HAZARDOUS CHARACTERISTICS

REACTIVITY ☒ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE
☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER ☐
 OTHER HAZARDOUS CHARACTERISTICS
☒ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL
☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER ☐
 USEPA HAZARDOUS WASTE? ☒ YES ☐ NO
 USEPA HAZARDOUS CODE(S) D001
 STATE HAZARDOUS WASTE? ☒ YES ☐ NO
 STATE CODE(S) SAME

H SPECIAL HANDLING INFORMATION

WEAR EYE PROTECTION & RUBBER GLOVES

☐ ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE

TITLE

DATE

Harry L. Murphy

Quality Assurance Mgr 5/17/84

D 78619

WASTE PROFILE SHEET CODE

CERTIFICATION OF REPRESENTATIVE SAMPLE

GENERAL DIRECTIONS: IN ORDER TO DETERMINE WHETHER WE CAN ACCEPT THE SPECIAL WASTE DESCRIBED IN THE ABOVE NUMBERED PROFILE SHEET, WE MUST OBTAIN A REPRESENTATIVE SAMPLE OF THE WASTE. WE WILL ANALYZE THE SAMPLE TO VERIFY THE INFORMATION YOU HAVE PROVIDED US, SO IT IS PARTICULARLY IMPORTANT THAT THE SAMPLE BE TRULY REPRESENTATIVE. IN MOST CIRCUMSTANCES YOU WILL BE OBTAINING THE SAMPLE. HOWEVER, IN THOSE CASES IN WHICH WE OBTAIN THE SAMPLE, WE MUST ASK THAT ONE OF YOUR EMPLOYEES BE PRESENT TO DIRECT THE PARTICULAR SOURCE TO BE SAMPLED AND TO WITNESS THE SAMPLING. IN SUCH CASE, YOUR EMPLOYEE MUST SIGN THIS CERTIFICATION AS A WITNESS.

THIS CERTIFICATION MUST BE RETURNED, WITH THE REPRESENTATIVE WASTE SAMPLE, TO:

EXCLUSIVE PROPERTY OF	CHEMICAL WASTE MANAGEMENT, INC.
CHEMICAL WASTE MANAGEMENT INC., OAK BROOK, ILL.	KETTLEMAN HILLS DISPOSAL FACILITY
Not to be reproduced without specific written permission	P. O. BOX 471, 35251 OLD SKYLINE ROAD
from an authorized representative.	KETTLEMAN CITY, CA 93239

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED IN THE "GENERATOR'S WASTE MATERIAL PROFILE SHEET" ABOVE REFERENCED, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT:

1. HOUR AND DATE OF SAMPLING: 4/30/84 10:00 AM
2. SOURCE FROM WHICH SAMPLE TAKEN: 2 tanks for processing (stainless tanks) are of equal volume (samples combined into one sample.)
3. EQUIPMENT AND SAMPLING METHOD USED: sampling pipe at various depths.
4. AMOUNT OF SAMPLE OBTAINED: 2 gals
5. TYPE OF CONTAINER INTO WHICH SAMPLE WAS PLACED: plastic containers
6. THE SAMPLING EQUIPMENT USED, AND THE CONTAINER INTO WHICH THE SAMPLE WAS PLACED, WERE THEMSELVES UNCONTAMINATED BEFORE USE.
7. AT THE TIME OF SAMPLING I AFFIXED A LABEL TO THE CONTAINER IN THE FOLLOWING FORM WITH THE FOLLOWING INFORMATION (FILL IN THIS PORTION, INCLUDING YOUR SIGNATURE, JUST AS IT APPEARS ON THE LABEL YOU PREPARED):

GENERATOR:	<u>Trint Tube</u>
WASTE NAME:	<u>Neutralized Nitric acid</u>
SAMPLE HOUR/DATE:	<u>4/30/84 10:00 AM</u>
PROFILE SHEET CODE:	
SAMPLER SIGNATURE:	<u>Harry L Murphy</u>

WITNESS VERIFICATION: I WAS PERSONALLY PRESENT DURING THE SAMPLING DESCRIBED; I DIRECTED THE WASTE SOURCE TO BE SAMPLED; AND I VERIFY THE INFORMATION ABOVE NOTED.

WITNESS: MELVIN W SHORT
 SIGNATURE: Melvin W Short
 TITLE: BUYER
 EMPLOYER: Trint Tube
 DATE: 5/17/84

SAMPLER NAME: Harry L Murphy
 SIGNATURE: Harry L Murphy
 TITLE: Mgr. Quality Assurance
 EMPLOYER: Trint Tube Div.
 DATE: 5/17/84

LABORATORY REVIEW OF SAMPLING PROTOCOL.
 BASED UPON MY REVIEW OF THE ABOVE PROFILE SHEET, I CONCLUDE THAT THE ABOVE METHODOLOGY IS:

☐ ADEQUATE FOR YIELDING A REPRESENTATIVE SAMPLE.

☐ INADEQUATE FOR THE REASONS NOTED HEREON.

DATE: _____

LAB MGR: _____



ASSOCIATED LABORATORIES

806 North Batavia - Orange, California 92668 - 714/771-6900

CLIENT

Industrial Waste Utilization
P. O. Box 1163
Brea, Ca. 92621
Attn: Chuck Templer

LAB NO. E04364
REPORTED 5/10/84

SAMPLE Neutralized Nitric Acid
IDENTIFICATION w/Hydrofluoric
Trent Tube, 2100 E. Orangethorpe,
Fullerton, Ca.
BASED ON SAMPLE As Submitted

RECEIVED 4/30/84

pH	6.1
Specific Gravity	1.80 (Hydrometer)
Total Chromium	0.245 %
Nickel	0.225 %
Iron	0.458 %
Fluoride	1.58 %
Ammonia	7.14 %
Ammonium Fluoride	3.08 %

.00245 = 2450 ppm

ASSOCIATED LABORATORIES

Edward S. Behare, Ph.D.

ESB/jg

TESTING & CONSULTING

Chemical •
Microbiological •
Environmental •

The reports of the Associated Laboratories are confidential property of our clients and may not be reproduced or used for publication in part or in full without our written permission. This is for the mutual protection of the public, our clients, and ourselves.

WASTE PRODUCER, PLEASE CHECK APPLICABLE PERMIT REQUEST:

☐ New Permit
☐ Renewal Permit (Current Permit No. _____ Date _____)
☒ Amendment and (Current Permit No. 3-3966 Date 25-26-83) Issue
☐ Verbal Permit (No. _____ Date _____)
 (If given verbal emergency permit by telephone)

For Office Use Only:

Permit # 3-4962
 Date Handled 5/11/84
 Date Sent 5/11/84

Department of Health Services
 CALIFORNIA DEPARTMENT OF HEALTH SERVICES
 Hazardous Materials Management Section
 7 South Broadway, Room 7128
 Los Angeles, CA 90012

Section Offices:

714/744 P Street
 Sacramento, CA 95814
 (916) 322-2337

2151 Berkeley Way
 Berkeley, CA 94704
 (415) 540-2043

5545 East Shields Avenue
 Fresno, CA 93727
 (209) 291-6676

107 South Broadway
 Rm. 7012
 Los Angeles, CA 90012
 (213) 620-2380

APPLICATION FOR
 CALIFORNIA EXTREMELY HAZARDOUS WASTE DISPOSAL PERMIT*

Please type or print clearly. Provide all information requested, since omissions will result in delay or denial of permit. Allow 15 days process time from day of receipt.

WASTE PRODUCER:

Name of Firm COLT INDUSTRIES - CRUCIBLE OPERATING DIV. INC.
TRENT TUBE DIVISION
 Street and No. (Or P.O. Box) P.O. BOX 3068 - 2100 E. ORANGETHORPE AVENUE
 City FULLERTON State CA Zip Code 92634
 Telephone No. 714) 526-5522 County ORANGE
 Pick Up Address (If Different) _____

PROPOSED HAULER:

Applicant HARRY L. MURPHY Title MANAGER OF QUALITY ASSURANCE
(SECONDARY)
INDUSTRIAL WASTE UTILIZATION
LIQUID WASTE MANAGEMENT
1369 W. 9th STREET P.O. BOX 1163
UPLAND, CA 91786 BREA, CA 92621
800-824-3345 714-529-3237
CAT 080034184 CAD 980585293
 Hauler Reg. No. _____

*Amended

PROPOSED DISPOSAL (OR OTHER) FACILITY:

CASMALIA RESOURCES (ALT) KETTLEMAN HILLS
CASMALIA, CA P.O. BOX 1104
COALINGA, CA 93210
CAT000646117

PROPOSED METHOD OF DISPOSAL:

Burial ☐ Ponding ☒ Storage ☐ Other (Specify) _____
 Treatment (Specify type) EVAPORATION OF WATER AND ENCAPSULATION
 Recycle (Specify method of reuse) _____

*Required for handling or disposal of extremely hazardous wastes (Section 66570, Title 22, CAC).

Collett

CALIFORNIA DEPARTMENT OF HEALTH SERVICES
Hazardous Materials Management Section

APPLICATION FOR
CALIFORNIA EXTREMELY HAZARDOUS WASTE DISPOSAL PERMIT

DESCRIPTION OF WASTE (Including Composition with Upper and Lower Concentration of Hazardous Components)	CONCENTRATION			QUANTITY (For year's permit give estimated quantity per disposal and per year)
	Lower	Upper	Units, % or ppm	
AMMONIUM BIFLUORIDE	0	400	ppm	5 to 15 POUNDS
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
(Attach page(s) for additional wastes)				

DESCRIPTION OF PACKAGING: (Packaging, Containerization)

Drums _____ Cartons _____ Bottles _____ Tank Truck X

Other _____
Specify method of packaging small containers _____

Packaging, containerization, and transport of the material shall be in accordance with Title 49, Code of Federal Regulations for hazardous materials, and with regulations of the California Highway Patrol, Title 13, California Administrative Code, for intrastate transport of hazardous materials and, for PCB-containing wastes, in accordance with U.S.E.P.A. regulations set forth in Title 40 CFR Part 761.

PERMIT TO BE USED FOR: (Length of Time)

Single Disposal X

One Year Maximum for Multiple Disposals _____

PERMIT RENEWALS: (Application for renewal of a one-year blanket permit, using this form, must be received at least 15 days prior to expiration date to keep permit in effect).

Signature of Applicant

Harry L. Murphy

Company and City

TRENT TUBE DIVISION - FULLERTON, CA

Date

MAY 7, 1984

1/22/81

NGSC-DTSC005060

UNIFORM HAZARDOUS WASTE MANIFEST

Department of Health Services
Department of Transportation

STATE ID NUMBER 83432433

GENERATOR NAME AND MAILING ADDRESS

Trans Tech
2100 E. Granger Ave.
Billerica, MA 01262

714-526-5522

AREA CODE/PHONE NUMBER

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

VEH/CONTAINER NO. 8325180

TRANSPORTER NO. 1

Industrial Waste Utilization

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BET Landfill
2210 S. Anna Rd.
West Covina, CA 91791

913-965-0916

AREA CODE/PHONE NUMBER

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBERGROSS
QUANTITYUNIT
WT/VOLCONTAINER
NO. TYPE CAT NO. MET

Hazardous Waste - 1000 LBS

UN 1789

1000 LBS

P

D101 P1151

COMPONENTS

CONC RANGE

UNITS

UPPER

LOWER

PPM

Sick Tank

Sick Tank

10

80

X

Leachate

Leachate

8

5

X

Plastic Liner

Plastic Liner

4

2

X

Residue

Residue

2

1

X

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY

MO

DAY

YR

05

29

84

Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE REC'D

MO

DAY

YR

ACCEPTED

P

29

84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE REC'D

MO

DAY

YR

ACCEPTED

P

29

84

DISCREPANCY INDICATION SPACE

Facility owner or operator. Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. (Note: TSD facility complete waste number and instructions)

DATE RECEIVED & ACCEPTED

MO

DAY

YR

05

29

84

Street
City, State, ZIP
CA 95814

77250
STATED NUMBER

83432434

GENERATOR NAME AND MAILING ADDRESS
Trans Tech
2100 E. Orangeburg Ave.
Fullerton, CA 92630 714-528-5222
AREA CODE/PHONE NUMBER

MANIFEST DOCUMENT NUMBER
EPA ID NUMBER
040008725110

TRANSPORTER NO. 1
Industrial Waste Utilization

VEH/CONTAINER NO.
EPA ID NUMBER
040008725110

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.
EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY
BKK Landfill
2210 S. Arroyo Rd.
West Covina, CA 91791 213-953-0916
AREA CODE/PHONE NUMBER

EPA ID NUMBER
040008725110

PROPER U.S. DOT SHIPPING NAME AND HAZARD CLASS
HAZARDOUS SOLID WASTE

UN/NA NUMBER
TOTAL QUANTITY
UNIT
CONTAINER NO.
WASTE DISP. CAT. NO. METH.

COMPONENTS	CONC. RANGE	UNITS
STEEL TACK	20	25 X
RESIDUE	25	20 X

CONC. RANGE	UNITS
UPPER	LOWER
20	25
25	20

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.
Printed or typed full name and signature
HARRY L. MURPHY

MO. DAY YR.
05 29 84

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES
Printed or typed full name and signature
Ray Simpson

DATE REC'D & ACCEPTED
MO. DAY YR.
05 29 84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES
Printed or typed full name and signature

DATE REC'D & ACCEPTED
MO. DAY YR.

DISCREPANCY INDICATION SPACE

Facility owner or operator. Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number.
Printed or typed full name and signature
RAY SIMPSON

DATE RECEIVED & ACCEPTED
EPA ID NUMBER
040008725110
MO. DAY YR.
05 30 84

STATE ID NUMBER **83432435**

GENERATOR NAME AND MAILING ADDRESS

Trans Tube
2100 Orangeburg Ave.
Dallas, TX 75243

AREA CODE/PHONE NUMBER

214-526-1522

TRANSPORTER NO. 1

INDUSTRIAL Waste Utilization

VEH/CONTAINER NO.

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

Trans Tube

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

Box Landfill
2210 S. Arden Rd.
Fort Collins, CO 91791

213-665-8918

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA NUMBER

TOTAL QUANTITY

UNIT WT/VOL

CONTAINER NO. TYPE CAT. NO. METH

TANK - HAZARDOUS WASTE SOLID RES

NA 9/18/89

10000 P

DOT 17 13 12 05

COMPONENTS

CONC RANGE

UNITS

STEEL TANK

90

80

X

CARBON BLACK LINER

8

3

X

PLASTIC LINER

4

2

X

RESIDUE

2

1

X

SPECIAL HANDLING INSTRUCTIONS

GLOVES

This is to certify that the above named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

MARKS E. MURPHY

05 29 89

Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

DATE REC'D

MO.

DAY

YR

Printed or typed full name and signature

ACCEPTED

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

DATE REC'D

MO.

DAY

YR

Printed or typed full name and signature

ACCEPTED

DISCREPANCY INDICATION SPACE

Facility owner or operator. Certification of receipt of hazardous waste covered by this manifest except as noted in this discrepancy indication space above. Note: TSD must complete waste number.

DATE RECEIVED & ACCEPTED

MO.

DAY

YR

Theresa K. Smith

05 29 89

EPA ID NUMBER

TSD RETAINS

Agency Name
STATEMENT BRANCH

UNIFORM HAZARDOUS WASTE MANIFEST

Department of Health Services

STATE ID NUMBER

83170056

GENERATOR NAME AND MAILING ADDRESS

TRENT TUBE COMPANY
2100 E. ORANGETHORPE AVENUE
FULLERTON, CA 92634

714-526-3522

AREA CODE/PHONE NUMBER

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CA 00008325110

TRANSPORTER NO. 1

VEH/CONTAINER NO.

EPA ID NUMBER

TRANSPORTER NO. 2
UNITED PUMPS & SERVICES
14016 E. VALLEY BLVD
CITY OF INDUSTRY, CA

VEH/CONTAINER NO.

EPA ID NUMBER

00052419 CA 00729537

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BKK LANDFILL
2210 S. AZUSA ROAD
WEST COVINA, CA 91791

213-965-0916

AREA CODE/PHONE NUMBER

EPA ID NUMBER

CA 00577857

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA
NUMBER

TOTAL
QUANTITY

UNIT
WT/VOL

CONTAINER
NO. TYPE

WASTE DISF
CAT. NO. MET?

1.0 Hazardous Waste Liquid Gas
ORM-E

HAZ 1.8A
11111

5000 G

0101 KIT

1340 B

OF

COMPONENTS

CONC. RANGE
UPPER LOWER

UNITS
% PPM

1.1 Water

99

98

X

1.2 Detergent

1

.5

X

1.3 Oil

1

.5

X

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY
Harry L. Murphy

MO.

DAY

YR.

05

29

84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

DATE
REC'D
&
ACCEPTED

MO.

DAY

YR.

Printed or typed full name and signature

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

DATE
REC'D
&
ACCEPTED

MO.

DAY

YR.

Printed or typed full name and signature

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number.

DATE RECEIVED & ACCEPTED

EPA ID NUMBER

MO.

DAY

YR.

Printed or typed full name and signature

CA 0060785149

05

30

84

TSDF RETAINS

NGSC-DTSC005064

15814
Type with ELITE type (12 characters per inch)

77250

STATE ID NUMBER 83432440

GENERATOR NAME AND MAILING ADDRESS Trans Tech 2100 E. Grangerthorne Ave. Pullerton, CA 92694 714-525-5522		MANIFEST DOCUMENT NUMBER EPA ID NUMBER 6AD008325110	
AREA CODE/PHONE NUMBER TRANSPORTER NO. 1 Industrial Waste Utilization		VEH/CONTAINER NO. EPA ID NUMBER 630510AD080585893	
TRANSPORTER NO. 2/ALTERNATE TSD FACILITY TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY BIK Landfill 2210 S. Azusa Rd. West Covina, CA 91791 213-955-0916		VEH/CONTAINER NO. EPA ID NUMBER 6AD087706749	
AREA CODE/PHONE NUMBER PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS Corrosive Solid, H.C.S., Corrosive Material		UN/NA NUMBER 1959	
TOTAL QUANTITY 800		UNIT WT/VOL 001000 18/03	
COMPONENTS		CONC. RANGE UPPER LOWER	
Solidified Acid		10 5 X	
Plastic balls		70 55 X	
Absorbent		10 5 X	
SPECIAL HANDLING INSTRUCTIONS This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.		MO. DAY YR 05 30 84	
Printed or typed full name and signature HARRY L. ALLEN Harry L. Allen		MO. DAY YR 05 30 84	
TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES David L. Allen Printed or typed full name and signature		DATE REC'D & ACCEPTED MO. DAY YR 05 30 84	
TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES Printed or typed full name and signature		DATE REC'D & ACCEPTED MO. DAY YR	
DISCREPANCY INDICATION SPACE 0.94		DATE RECEIVED & ACCEPTED MO. DAY YR 05 31 84	
Facility owner or operator. Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number.		EPA ID NUMBER 6AD067726719	
Printed or typed full name and signature Jhera K. Shih		MO. DAY YR 05 31 84	

TO BE FILLED IN BY GENERATOR

TO BE FILLED IN BY TRANSPORTER

TO BE FILLED IN BY TSD

USE OF THIS MANIFEST

UNIFORM HAZARDOUS WASTE MANIFEST

Department of Health Services

STATE ID NUMBER 83432441

GENERATOR NAME AND MAILING ADDRESS
Trent Tube
2100 E. Orangeflora Ave.
Fullerton, CA 92634
AREA CODE/PHONE NUMBER **714-26-5522**

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CAID008925110

TRANSPORTER NO. 1
Industrial Waste Utilization

VEH/CONTAINER NO.

EPA ID NUMBER

51851 CAID980585293

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

EPA ID NUMBER

Barn Makalee
525 E. Alondra Blvd.
Gardena, CA 90248
AREA CODE/PHONE NUMBER **213-532-0730**

CAID097465192

PROPER U.S. DOT SHIPPING NAME AND HAZARD CLASS

UN/NA NUMBER

TOTAL QUANTITY

UNIT WT/VOL

CONTAINER NO

TYPE

WASTE CAT NO

DISF MET

1,1,1, Trichloroethane

UN 2831

001/45

G

004 DIX 211101

COMPONENTS

CONC. RANGE

UNITS

UPPER

LOWER

%

PPM

TRICHLOROETHANE

70

60

✓

OIL

40

30

✓

SPECIAL HANDLING INSTRUCTIONS

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY
Harry L. Murphy

MO.

DAY

YR

05

30

84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

David R. Alloy

David R. Alloy

DATE REC'D & ACCEPTED

MO.

DAY

YR

015

310

814

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE REC'D & ACCEPTED

MO.

DAY

YR

DISCREPANCY INDICATION SPACE

129 gallons

Facility owner or operator. Certification of receipt of hazardous waste covered by this manifest except as noted in the instructions. Note: TSD must complete waste number.

DATE RECEIVED & ACCEPTED

EPA ID NUMBER

MO.

DAY

YR

Michael Childs
Michael Childs

CAID097465192-05

06

21

84

Printed or typed full name and signature

UNIFORM HAZARDOUS WASTE MANIFEST
772-50 STATE ID NUMBER 83432442
MANIFEST DOCUMENT NUMBER
EPA ID NUMBER
GENERATOR NAME AND MAILING ADDRESS
Frank Tuba
2100 E. Orangeforge Ave.
Fullerton, CA 92631
714-266-5522
AREA CODE/PHONE NUMBER
TRANSPORTER NO. 1
Industrial Waste Utilization
TRANSPORTER NO. 2/ALTERNATE TSD/FACILITY
TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY
BKI Landfill
2210 S. Arroyo Rd.
West Covina, CA 91791
213-965-0916
AREA CODE/PHONE NUMBER
PROPER U.S. DOT SHIPPING NAME AND HAZARD CLASS
1.0 Flammable Solid, R.C.S.
2.0 HAZARDOUS WASTE SOLID, NOC
UN/NA NUMBER
TOTAL QUANTITY
UNIT WT/VOL
CONTAINER NO.
WASTE CAT. NO.
DISP METH
COMPONENTS
CONC RANGE
UPPER LOWER
UNITS
% PPM
1.0 PAINT SLUDGE
1.2 ABSORBENT
2.1 TRICHLOROETHANE E.O.
2.2 ABSORBENT
SPECIAL HANDLING INSTRUCTIONS
This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.
HARRY L. MURPHY
Harry L. Murphy
TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES
David E. Allen
Printed or typed full name and signature
TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES
Printed or typed full name and signature
DISCREPANCY INDICATION SPACE
2.12
Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD/F must complete waste number.
Theresa Kristall
Printed or typed full name and signature
EPA ID NUMBER
DATE RECEIVED & ACCEPTED
MO. DAY YR
CA00067784749
05 31 89
TSDF RETAINS THIS

APPENDIX E

CERTIFICATION OF CLOSURE

AUGUST 29, 1984



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

August 29, 1984

Mr. Angelo Bellomo
Regional Administrator
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, California 90012

Re: Closure Certification
Trent Tube Facility
Fullerton, California
CAD 008325110

Dear Sir:

On August 16, 1984, Mr. Richard Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, inspected the vacant Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.

Based on his inspection of the physical facilities, as well as photographs, manifests and billing records, we hereby certify that the Facility has been closed in accordance with the "Closure Plan" submitted by Trent Tube Division to your office on April 1, 1984.

The closure activities also included removal of the top three (3) feet of oil-contaminated soil on the two (2) areas on the south side of the Plant which were referenced in Mr. James Anderson's memo to you of May 4, 1984.

We therefore request that you delete the Interim Status Permit for this Facility from your records.

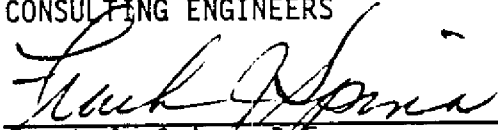
For:

TRENT TUBE DIVISION
CRUCIBLE MATERIALS CORP.

D. R. Gehr
Vice President
Technical Services

For:

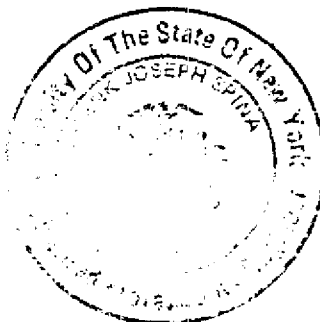
CALOCERINOS & SPINA
CONSULTING ENGINEERS



Frank J. Spina, P.E.
Partner

CC: Mr. James Anderson
Executive Officer
Regional Water Quality Board
Suite 200, 6809 Indiana Street
Riverside, California 92506

Mr. Harry Murphy, Trent Tube Div.





Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

December 13, 1984

Mr. Angelo Bellomo
Regional Administrator
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, California 90012

Re: Closure Certification
Trent Tube Facility
Fullerton, California
CAD 008325110

Dear Sir:

On August 16, 1984, Mr. Richard Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, inspected the vacant Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.

Based on his inspection of the physical facilities, as well as photographs, manifests and billing records, we hereby certify that the Facility has been closed in accordance with the "Closure Plan" submitted by Trent Tube Division to your office on April 1, 1984.

The closure activities also included removal of the top three (3) feet of oil-contaminated soil on the two (2) areas on the south side of the Plant which were referenced in Mr. James Anderson's memo to you of May 4, 1984.

We therefore request that you delete the Interim Status Permit for this Facility from your records.

For:

TRENT TUBE DIVISION
CRUCIBLE MATERIALS CORP.

D. R. Gehr
Vice President
Technical Services

For:

CALOCERINOS & SPINA
CONSULTING ENGINEERS

Frank J. Spina, P.E.
Partner

CC: Mr. James Anderson
Executive Officer
Regional Water Quality Board
Suite 200, 6809 Indiana Street
Riverside, California 92506

Mr. Harry Murphy, Trent Tube Div.



APPENDIX F

LETTER COMMENT BY DEPARTMENT OF HEALTH SERVICES
AND
PROPOSED SITE ASSESSMENT PLAN

DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 3128
LOS ANGELES, CA 90012



December 3, 1984

Mr. Robert M. Phillips
Trent Tube Division
Crucible Materials Corp
P.O. Box 88
Pittsburgh, PA 15230

Dear Mr. Phillips:

CLOSURE PLAN DEFICIENCIES RE: CLOSURE OF TRENT TUBE FACILITY, FULLERTON, CA
(CAD 008325110)

The closure plan you submitted on August 24, 1983 regarding the subject facility is inadequate. Therefore, the subsequent closure certification is inappropriate.

You are directed to submit to this office by December 15, 1984 a revised written site assessment plan prepared by an independent engineer registered in the State of California.

The plan must provide for sampling and chemical assessment of all areas which were excavated at the direction of the California Regional Water Quality Control Board and all other areas that could be contaminated with hazardous wastes. Areas where chlorinated solvents were used, stored, or may have been spilled are of particular concern. The plan must identify all principals, including the analytical laboratory and all other contractors used. Drawings, sketches and/or photographs necessary to fully describe areas of concern and proposed remedial actions should also be included.

The assessment plan must be approved by this office prior to any further construction, excavation or other work in the affected areas.

If you have any questions or wish to further discuss this matter please call Roy Thielking of my staff.

Sincerely,

John Hinton, P.E., Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

JH:RT:kp

cc: See attached list

CERTIFIED

James Anderson, Executive Officer
California Regional Water
Quality Control Board
Santa Ana Region
6809 Indiana Ave., Suite 200
Riverside, CA 92506

Harry Murphy
Trent Tube Division
Colt Industries Operating Corporation
430 Park Avenue
New York, NY 10022



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13068 • (315) 457-6711

December 18, 1984

Mr. Roy Thielkin
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, California 90012

Re: Site Assessment Plan
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Thielkin:

In accordance with Mr. Hinton's letter of December 3, 1984, and our discussion during the meeting in your office on December 14, 1984, we are hereby submitting a Site Assessment Plan for the Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.

As you will note, we anticipate performing the site borings during the period of December 26-28, 1984. We would therefore appreciate receiving your comments at the earliest possible time.

Please feel free to call us if you have any questions or need additional information.

Very truly yours,

CALOCERINOS & SPINA

RWK:mts

Richard W. Klippel, P.E.
Industrial Waste Manager

Enclosure

CC: W. Smith, Esq. (w/ enc.)
Mr. D. Bramwell, IT Corp. (w/enc.)
Mr. R. Phillips, Trent Tube (w/enc.)
Mr. J. Devaney, Colt Industries

SITE ASSESSMENT PLAN
TRENT TUBE DIVISION PLANT
2100 EAST ORANGETHORPE AVENUE
FULLERTON, CALIFORNIA
CAD 008325110

I. Background Information

Trent Tube Division of Crucible Material Corporation ceased operation of their manufacturing facility at 2100 East Orangethorpe Avenue, Fullerton, California, on March 11, 1984. In accordance with Article 4, para. 66402, of the California Waste Management Regulations, notice of the anticipated closure along with a Closure Plan and cost estimate plus a copy of the Operation Plan were submitted to the California Department of Health Services by certified letter on August 24, 1983. No comments on that submittal were received.

From March 28-30, 1984, Mr. Richard W. Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, and Robert Phillips of Trent Tube inspected the Plant and assisted Mr. Harry Murphy, Plant Manager, in updating and revising the Closure Plan and cost estimate. On March 29, 1984, Mr. Klippel and Mr. Phillips met with Mr. Kurt Burchtold of the Santa Ana Regional Water Quality Control Board to discuss the pending Plant closure and submittal of the notice and revised Closure Plan. Mr. Burchtold advised Trent Tube to submit the Plan to both the Water Quality Control Board and the California Department of Health Services for review.

On April 1, 1984, in accordance with provisions of Attachment A, Section V, of the Interim Status Document, CAD 008325110, the Revised Closure Plan and cost estimate were submitted by certified letter to the Santa Ana Regional Water Quality Control Board. As per Mr. Burchtold's

recommendation, a copy of the Plan was sent to the Department of Health Services. That Closure Plan identified the actual closure date of May 11, 1984.

On May 4, 1984, Trent Tube received a copy of a memo from the Regional Water Quality Control Board to the Department of Health Services referring closure approval for the facility to the Department of Health Services.

In that memo, the Regional Water Quality Board stated that no problems were noted during their inspection of the facility or in their review of the Closure Plan, with one exception. That exception involved small areas of soil contaminated with waste oil which were noted on the south side of the Plant during their inspection. Their memo notes that the Plant Manager, Mr. Harry Murphy, stated that, during closure, the soil in these areas would be removed to a depth of three (3) feet.

On May 11, 1984, Trent Tube ceased manufacturing at the facility and during the remainder of the month, closure activities as described in the Closure Plan were carried out under the supervision of Mr. Harry Murphy. As agreed in his meeting with the Regional Water Quality Control Board staff, the two small areas of soil stained by waste oil were excavated to a depth of three (3) feet and the excavations were filled with clean crushed stone.

On August 16, 1984, Mr. Richard Klippel under the direction of Mr. Frank Spina, California P.E. #39026, Partner, Calocerinos & Spina, Consulting Engineers, inspected the vacant and closed facility and reviewed photographs, manifests and billing records pertaining to the closure activities. On August 29, 1984, Mr. Frank Spina on the basis of Mr. Klippel's inspection, certified by letter that the facility was closed in accordance with the Closure Plan dated April 1, 1984.

II. Purpose of Plan Submitted

On December 12, 1984, the appropriate Trent Tube personnel received a letter dated December 3, 1984, from the California Department of Health Services, Facility Permitting Unit, advising the company that the Closure Plan was inadequate and the subsequent closure certification inappropriate. The letter directed that a written Site Assessment Plan, prepared by an independent engineer registered in the State of California, be submitted to their office by December 15, 1984. The letter further stated that the Plan must provide for sampling and chemical assessment of all areas which were excavated at the direction of the Regional Water Quality Control Board and all other areas that could be contaminated with hazardous wastes. The Plan must identify all principals, including the analytical laboratory, and all other contractors used. The Plan should also include drawings, sketches and/or photographs necessary to fully describe areas of concern and should propose remedial actions that would be taken if found to be necessary.

On December 14, 1984, officials of Trent Tube, Calocerinos & Spina, Consulting Engineers, and Wayne Smith, Esq., of Gibson, Dunn and Crutcher, Attorneys, met with Mr. Roy Thielkin of the Facility Permitting Unit staff and discussed the matter in some detail. At that meeting, it was agreed that Trent Tube would proceed with the submittal of the Site Assessment Plan and the subsequent execution of the activities upon Plan approval. Since Trent Tube has a purchase offer for the property and considers time to be of the essence, they requested that Mr. Thielkin publish the required public notice at the earliest opportunity. Furthermore, it was agreed that Trent Tube would attempt to complete the site evaluation procedure to the Department's satisfaction prior to the expira-

tion of the required 45-day public comment period. Thus, by approximately February 1, 1985, closure certification could be accomplished thereby allowing closing on the sale of the property.

This Site Assessment Plan is submitted in response to the December 3, 1984, letter request by the Department of Health Services and is specifically tailored to provide the information requested in that letter.

III. Goals of the Site Assessment Plan

The goal of the proposed Site Assessment Plan is to ascertain the presence of hazardous waste constituents in the soil at the Trent Tube facility and to recommend and implement necessary remediation if such materials are found to be present.

IV. Specific Location To Be Assessed

The initial site locations to be assessed are shown as locations A-1, A-2 and A-3 in Figure 1, attached, and are shown pictorially in Figures 2 and 3. The locations shown are those which were excavated at the direction of the Regional Water Quality Control Board. These areas are in close proximity to each of the diked areas where hazardous substances and/or hazardous wastes were stored and represent areas where previous excavation was carried out to remove soil which was visibly stained with oily substances. Specific sample sites in each area were selected to characterize those areas which were visibly contaminated and are generally located near the diked areas and opposite the locations of the dike drains which were periodically opened to remove trapped rainwater from the diked areas.

V. Assessment Procedure

At each of those locations shown in Figure 1 (A-1, A-2 and A-3), it is proposed that soil samples be obtained utilizing a 2-inch diameter

Modified California Sampler. Samples would be collected at three depths at each location. The upper depth would be at the top layer of soil directly beneath the recent excavation which would be approximately 3 feet deep. Additional samples at each location would be obtained at depths of 5 feet and 10 feet. Recent structural borings in the Plant yard confirm a thick layer of sand beneath the site with a water depth of greater than 25 feet.

Samples at each location would consist of a 6-inch long undisturbed soil sample contained within a capped section of 2-inch pipe. The sampling rig would be thoroughly decontaminated between samples and boring holes will be filled with a bentonite clay slurry upon completion.

Samples would be shipped in the sample collection cylinder and refrigerated until analysis. Samples would be delivered to the analytical laboratory on the same day and analyzed within 72 hours of collection. Each sample would be analyzed for the following constituents which were present in the hazardous wastes stored in the adjacent storage areas.

<u>Waste</u>	<u>Target Parameter</u>	<u>Method</u>
Chlorothene VG	1,1,1,Trichlorothane	GC - USEPA Method 601
Blended Solvents	Methylene Chloride	GC - USEPA Method 601
Mineral Spirits		
and Kerosene	Benzene, Toluene, Xylene	GC - USEPA Method 602

Results will be reported in terms of mg/kg (wet weight) as received.

To establish background concentrations in the area, additional samples at the same approximate depths will be taken in three (3) other

locations on the Plant site remote from the waste storage areas. These additional locations are labelled B-1, B-2 and B-3 on Figure 1. These nine samples would be analyzed for the same parameters.

In the interest of time, it is proposed that additional soil samples be collected at downgradient locations at increasing distances from the waste storage areas in order to determine the areal extent of any contamination that might be found. Such samples would be taken at the 3, 5 and 10-foot depths but would only be analyzed if significant contamination were found to exist in the initial set of samples (A-1, A-2 and A-3) adjacent to the waste storage areas. Analyses of these samples would be carried out within 14 days of collection and these samples would be kept refrigerated during the intervening period.

Analytical results of the A-1, A-2 and A-3 samples will be evaluated and compared against the analyses of the background samples (B-1, B-2 and B-3) at comparable depths. If the contaminants are found to exist in the A series samples in concentrations statistically higher than in the background (B series) samples, the same analyses would be performed on the samples taken at a greater distance from the storage areas (C series). If contamination is found in the C series samples, the D series of samples taken near the property line will be analyzed. The composite set of analytical results will then be utilized to determine the areal extent of any remediation that may be required. Such remediation, depending upon the nature and extent of any contamination found, may include either removal of contaminated soil to a secure disposal site or surface spreading and natural volatilization of the contaminants.

The results of the assessment including all analytical data, chain-of-custody sheets, maps and sketches as well as recommendations arising

from the assessment will be documented in a Site Assessment Report which will be promptly submitted to the Department of Health Services.

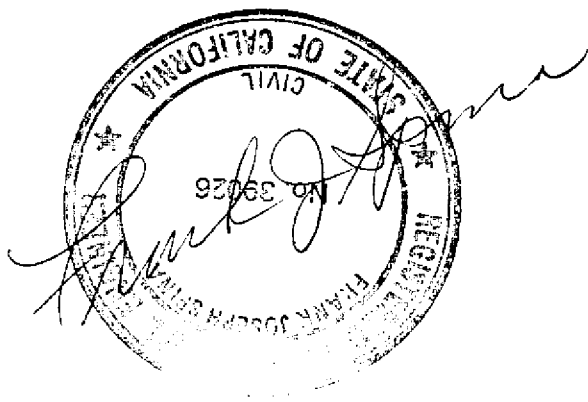
VI. Principals Involved In the Assessment Process

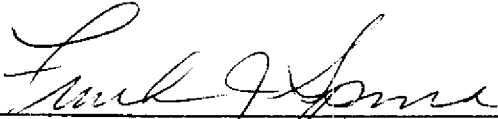
Certified Independent Engineer - Frank J. Spina, Calif. P.E. #39026
Principal Site Coordinator - Andrew F. Diefendorf, CPG (C&S)
Drilling Company - Pioneer Drilling Company
Redlands, Calif.
Analytical Laboratory - California Analytical Services
Sacramento, California
Soil Sampling - Mr. David Bramwell, CEG
IT Corporation, Irvine, California
Data Evaluation - Richard W. Klippel, P.E. (C&S)

VII. Projected Date of Assessment Effort

1. Submit Assessment Plan	- December 19, 1984
2. Obtain Boring Samples	- December 26, 27 and 28, 1984
3. Analysis of Samples	- December 27-28, 1984
4. Evaluation of Results	- January 2-15, 1985
5. Submittal of Assessment Plan	- January 15, 1985
6. Remediation of Site, if necessary	- January 15-30, 1985

Respectfully submitted,
CALOCERINOS & SPINA




Frank J. Spina, P.E.
Partner

FJS:RWK:mts

Attachments

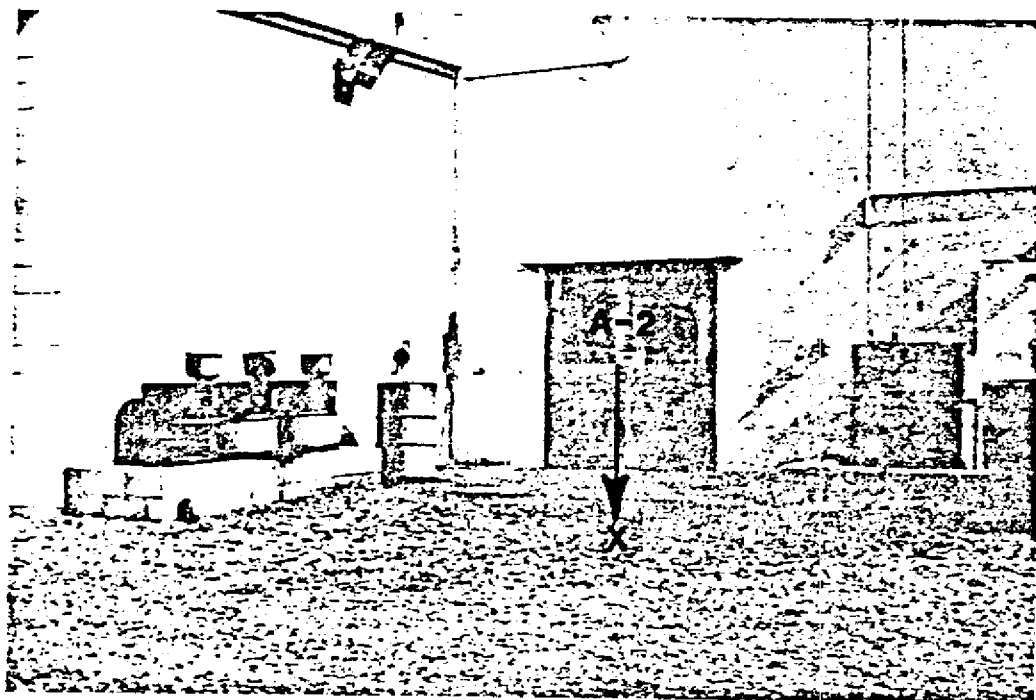


Figure 5 - Waste collection impound at south end of facility. Impounded drums contain waste 1,1,1 trichloroethane, waste kerosene, and waste mineral spirits.

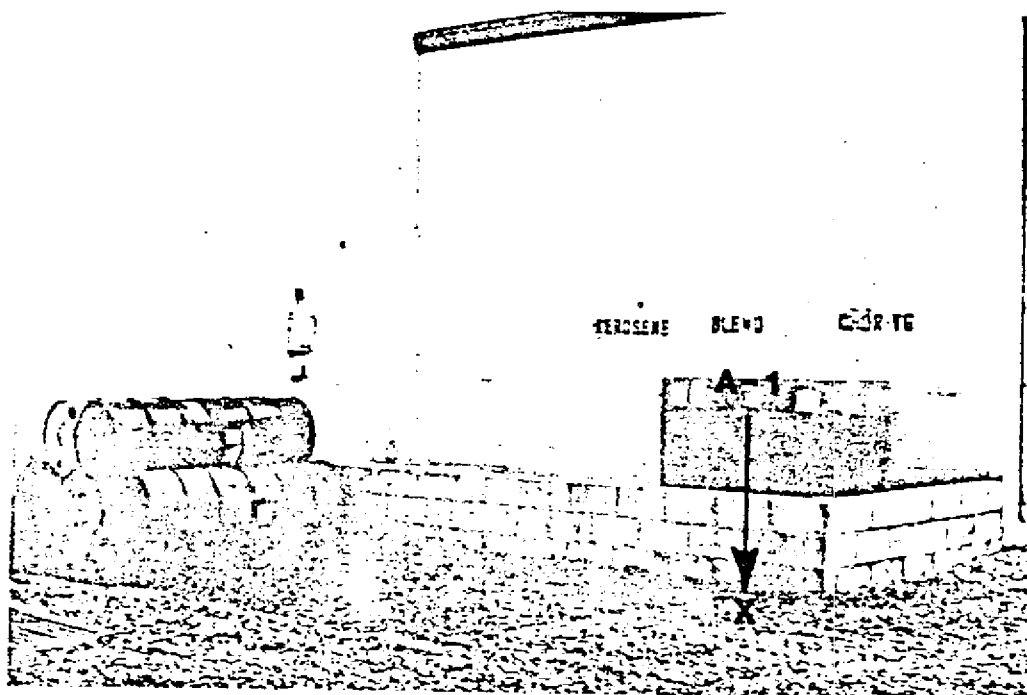


Figure 6 - Waste storage impound at southwest corner of plant. Non-impounded drums are empty.

FIGURE 2

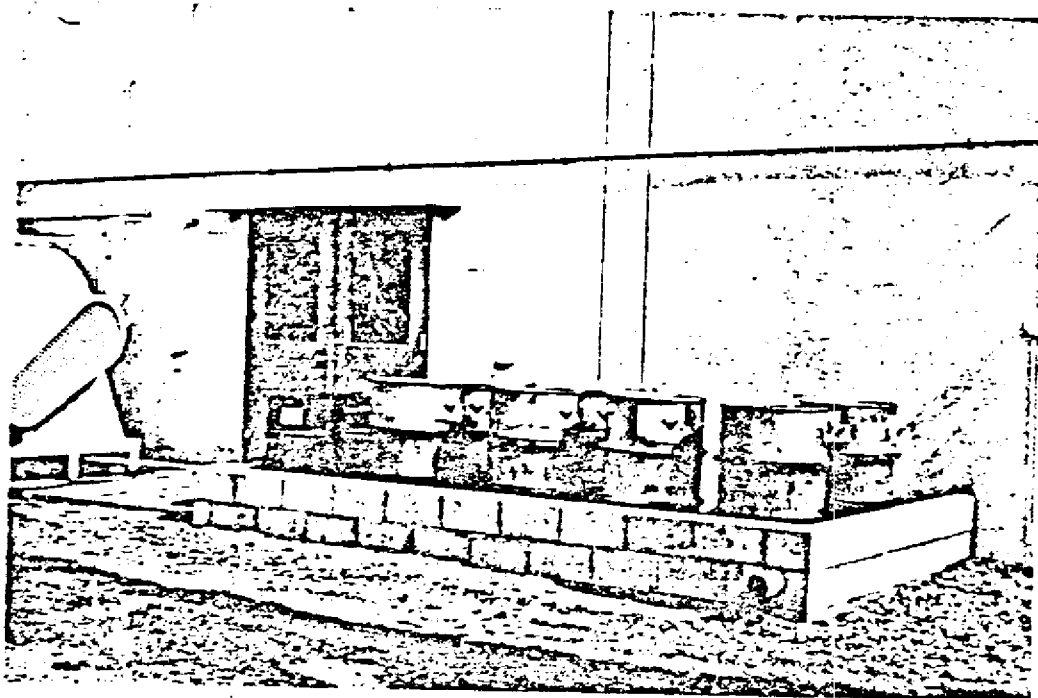


Figure 3 - Impound located at southeast corner of the plant used to store concentrated acids.

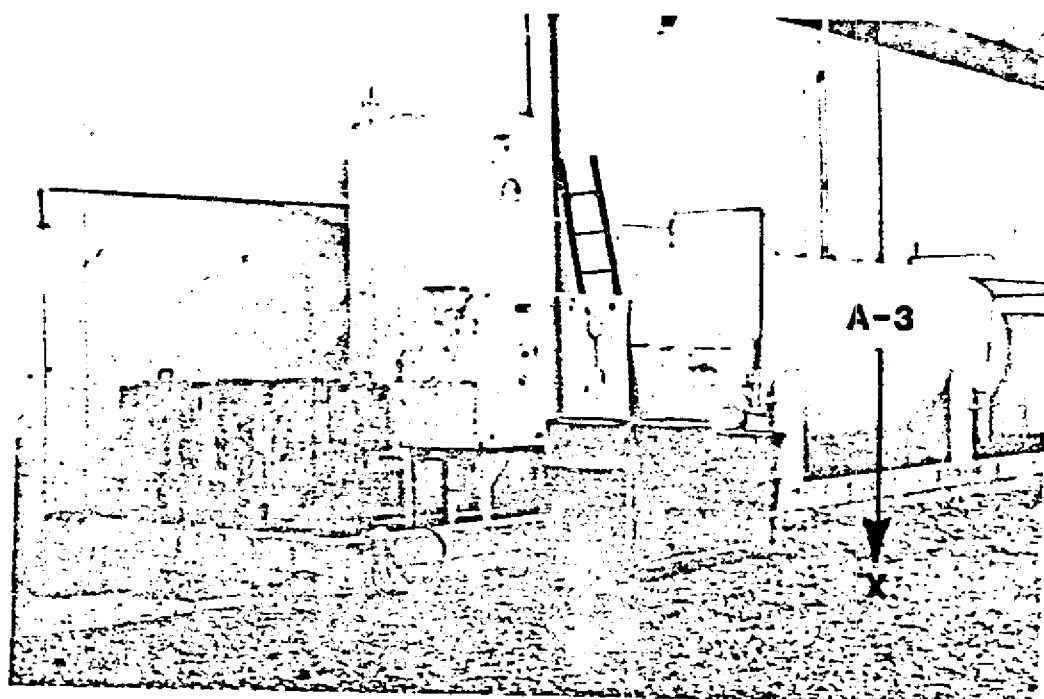


Figure 4 - Impound located at south end, center of plant. Tanks from left to right, store waste oil, waste detergent, unused 1,1,1 trichloroethane, kerosene and 1,1,1 trichloroethane. Drums contain kerosene to be stored in the kerosene tank.

FIGURE 3

APPENDIX G

PROPOSED SITE REMEDIATION PLAN



**Calocerinos & Spina
CONSULTING ENGINEERS**

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

January 18, 1985

Mr. Roy Thielking
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
197 Broadway, Room 7128
Los Angeles, California 90052

Re: Site Remediation Plan
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Thielking:

We have completed our site assessment for the above-referenced Project and present herein the results of that assessment and our proposed plan for remediation of the site.

Site Sampling

A total of 14 borings were completed as originally proposed at the rear of the facility and at background locations. An additional set of three borings (E Series) were completed at selected locations requested by you during the on-site program. Locations of all borings are indicated on the attached Site Plan (Figure 1). Drilling was conducted on December 26, 27, and 28, 1984, by Pioneer Drilling Company with inspection, sample preservation and logging conducted by Mr. David Bramwell, PG, of IT Corporation. Field supervision was performed by Mr. Andrew Diefendorf, CPG, of Calocerinos & Spina.

Soil samples were taken at approximately 3-, 5- and 10-foot depth intervals in all borings with the exception of the E Series at which location samples were obtained at approximately 2-, 4- and 6-foot depth intervals. Samples were either maintained within capped 6-inch or 4-inch California Sampler sleeves, which were then placed in polyethelene bags and stored in teflon-capped glass jars; or the samples were removed from the sampler and placed directly in laboratory-prepared, teflon-capped sample jars. All samples were refrigerated and air freighted to the analytical laboratory at the end of each day of drilling.

Results of Investigations

Attachment A presents the analytical results of all samples processed by California Analytical Laboratory. Of the 26 organic parameters included within the complete USEPA 601 and 602 scans performed, only 6 were identified on the site. Summary results of analyses for these six parameters are presented



Mr. Roy Thielking
January 18, 1985
Page 2

as Table 1. Note that of the samples analyzed at 17 locations only 3 (A-1, D-2 and C-3) indicate soil contamination above the allowable limit of 1 mg/kg at a depth of 3 feet. Only two locations (A-1 and C-4) indicated detectable contamination at a sampling depth in excess of three feet. With the exception of locations D-2 and C-3, contaminant concentrations detected were only slightly over the allowable limit.

Based on our review of previous soil removal (see Figure 2) and soil samples taken during this investigation (see Drill Logs, Attachment B), it is our opinion that the majority of contamination was removed during the original remedial efforts. Remnant contamination appears to be concentrated within a shallow (3.5- to 4.5-foot depth) zone of silty organic soil found in a limited area at the rear of the site (see Figures 3 and 4). Our past experience has shown that these fine-grained materials tend to adsorb and retain more of the solvents than the coarser and more porous underlying sand materials.

Portable organic vapor meter (OVM) readings taken during the sampling support the findings that the organic silty sand layer is retaining most of the spilled solvents. While the OVM readings indicate organic vapors dispersed throughout the relatively porous sandy deposits on the site, based on plots of OVM readings (Figures 5 through 7) at the three sample depths, two distinctive sources of contaminant are apparent. Both zones of contamination appear to result from surface runoff away from solvent storage areas in the vicinity of A-1 and A-2, respectively.

Previous excavation of soil from the area of A-2 resulted in removal of any detectable soil contamination in that area, although trace organic vapors are still present. On the other hand, the high concentration of solvents "downsurface" from A-2 at D-2 probably represents entrapment of the solvents within the organic soils immediately beneath the surficially lowest point of surface drainage between A-2 and the concrete drainage swale. The organic layer in this area is of low enough permeability to create a small pocket of trapped or perched water.

Inasmuch as fluid flow in the vadose (unsaturated) zone of the sand deposits beneath the organic layer should be vertical for approximately 80 feet (depth of water table), the spread of contamination at the rear of the site is probably directly related to surface water wash during periods of rain. Infiltrating solvent would be adsorbed by the finer-grained soil layer allowing that layer to act as a potential contaminant source during rainy periods. Note from Figures 3 and 5 that there is a strong correlation between the limits of detectable (greater than 1 ppm) OVM readings and the apparent limits of the organic silty sand layer. The significant quantity of rain prior to and during the period of this investigation may account for leaching of solvents from that layer such that detectable solvents were present at depth in a few of the borings.



Mr. Roy Thielking
January 18, 1985
Page 3

It should also be noted that no solvents were detectable at depth in areas where the stratigraphic section of sand is void of any silty organic containing layers. In these areas of relatively clean coarse sand there is very little particle surface upon which the solvent can be retained. Any solvent reaching depth in these areas has already escaped and, if it were not for the limited presence of an organic layer, no solvents would probably be currently detectable on the site.

The key to remediation of this site, therefore, becomes (1) removal of the primary source of contamination, the organic soil layer, and (2) prevention of further migration of any small quantities of solvent contained in deeper sands by elimination of surface water infiltration.

Controlling factors in the practicality of applied methods of remediating this site include (1) the proximity of various structures and (2) the potential low angle of repose of any sands which are excavated. Removal of soils in close proximity to structures may threaten the stability of those structures.

Proposed Additional Remediation

Because some remnant soil contamination is still present at the rear of the site, we recommend the following remedial actions:

1. Removal of all heavily contaminated soils outlined in Area "A" of Figure 8 to a depth of 4.5 feet (vertically, if possible) and transport to an approved disposal facility. This represents all contaminated soils within an approximately eight-foot radius of D-2.
2. Removal of all soils in Areas "B" and "C" (side slopes of 1:1.5, if possible) to the base of the organic layer (3.5 to 4.5 feet in depth). Note that these areas were delineated by overlay analysis of Figure 3 and 5.
3. All soils excavated from Areas "B" and "C" to be loosely spread in a selected area on the east side of the site in a layer not to exceed four inches in thickness and allowed to aerate for a minimum of one week.
4. Replacement of aerated soils back in excavation in compacted lifts not to exceed one-foot in thickness and redressing to ground surface with a minimum of four inches of approved gravel base.



Mr. Roy Thielking
January 18, 1985
Page 4

In addition, we recommend removal of solvent-stained soils along the embankments of the drainage swale at E-2 to a depth of six inches with disposal at an approved disposal site, and replacement of soils with granular (gravel) materials.

It is assumed that the volumes of soil to be removed as proposed may be the minimum necessary. In order to assess actual soil conditions encountered during remediation, we would utilize a portable OVM to determine if all pockets of significant contamination have been removed and if additional removal is required at time of excavation.

In order to facilitate successful closure of this facility, we request your immediate review and comment on this Proposal. Thank you in advance for your assistance in this matter.

Respectfully submitted,

CALOCERINOS & SPINA

A handwritten signature in black ink, appearing to read 'Andrew F. Diefendorf', written in a cursive style.

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

AFD:mts

CC: Mr. R. Phillips (w/enc)

TABLE 1
TRENT TUBE
FULLERTON, CALIFORNIA

RESULTS OF ANALYSES

PCE

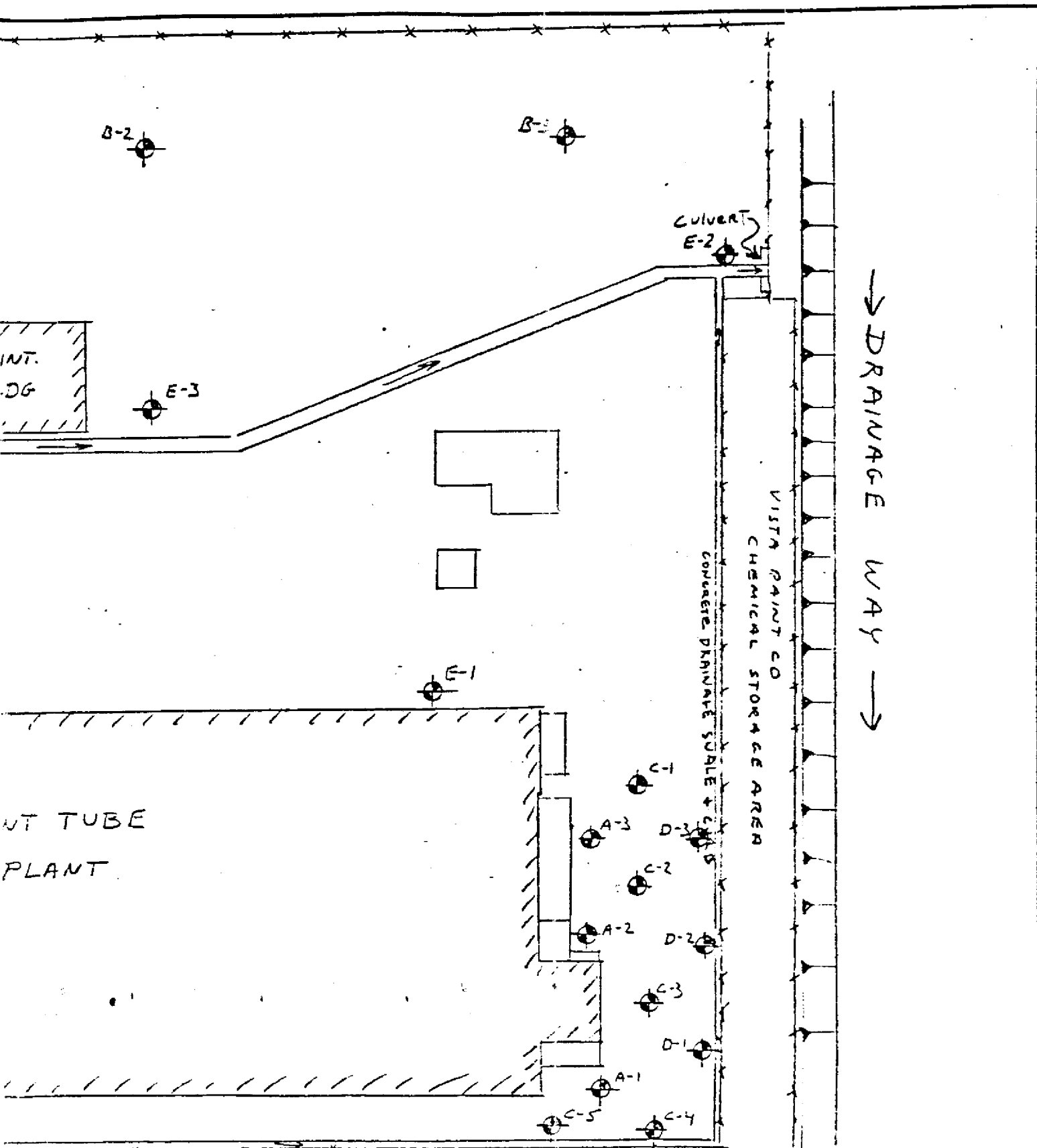
Sample Point	Depth (feet)	Contaminant Concentration in mg/kg (parts per million)					
		Method 601			Method 602		
		1,1,1-Tri-chloroethane	Tetrachloro-ethylene	Trichloro-ethylene	Ethyl-Benzene	Xylene	Toluene
A-1	3.5	1.2	1.1	LTD	1.7	2.7	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	1.5	1.7	LTD	LTD	LTD	LTD
A-2	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
A-3	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
A-4	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
B-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
B-2	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
B-3	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
C-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	--	--	--	--	--	--
	10.5	--	--	--	--	--	--
C-2	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	--	--	--	--	--	--
	10.5	--	--	--	--	--	--
C-3	3.5	2.2	5.3	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD

Table 1 (Continued)
Page 2

Sample Point	Depth (feet)	Contaminant Concentration in mg/kg (parts per million)					
		Method 601			Method 602		
		1,1,1-Tri-Chloroethane	Tetrachloro-ethylene	Trichloro-ethylene	Ethyl-Benzene	Xylene	Toluene
C-4	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	1.1
D-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	--	--	--	--	--	--
	10.5	--	--	--	--	--	--
D-2	3.5	780	21	70	LTD	95	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
D-3	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
E-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	4.0	--	--	--	--	--	--
	6.0	--	--	--	--	--	--
E-2	2.0	LTD	LTD	LTD	LTD	LTD	LTD
	4.0	--	--	--	--	--	--
	6.0	--	--	--	--	--	--
E-3	2.0	LTD	LTD	LTD	LTD	LTD	LTD
	4.0	--	--	--	--	--	--
	6.0	--	--	--	--	--	--

NOTES:

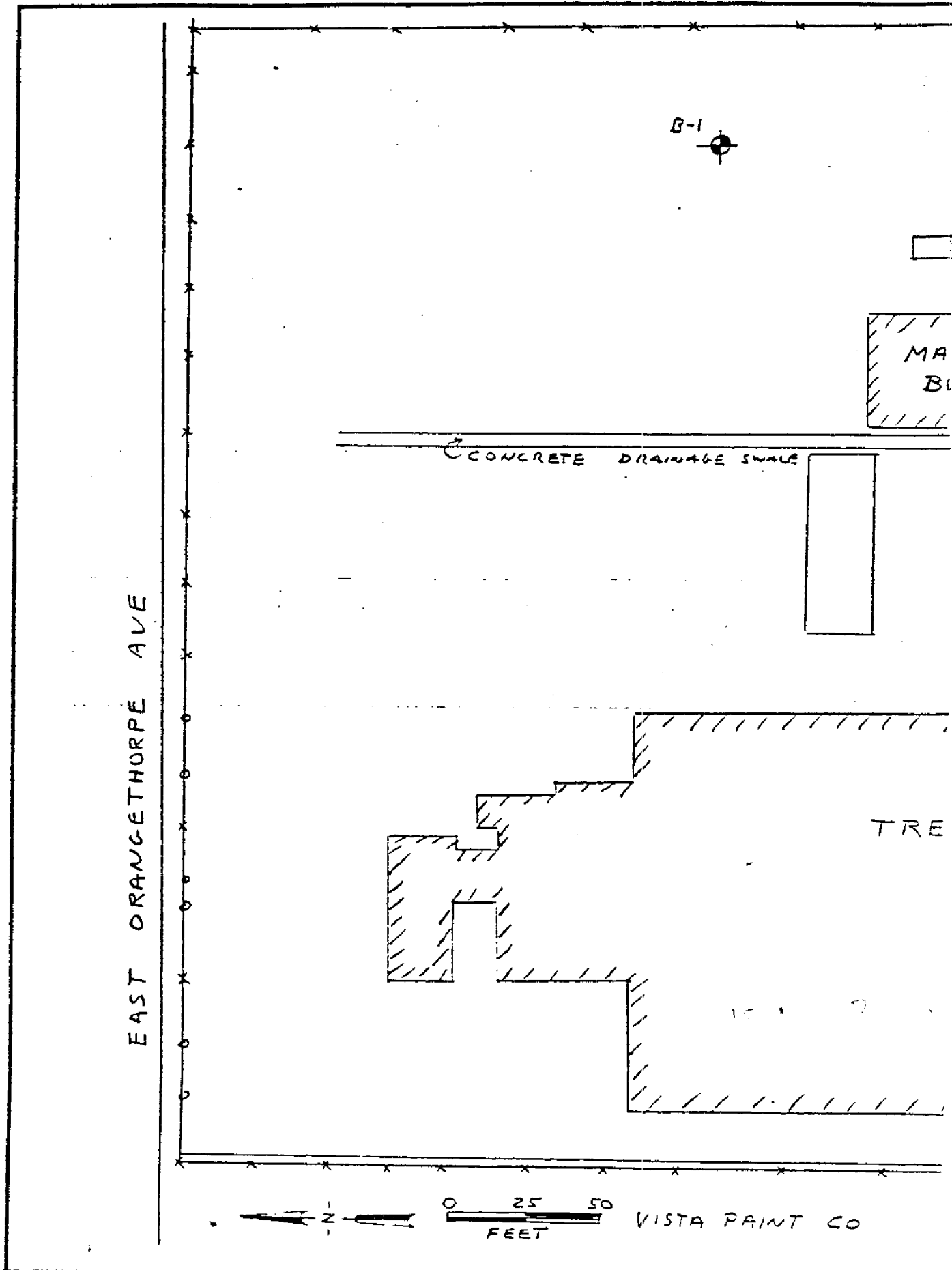
1. LTD = Less Than Detectable limit of 0.5 mg/kg.
2. -- = Sample Not Analyzed



Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088

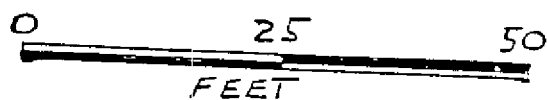
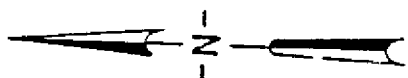
GENERAL SITE PLAN

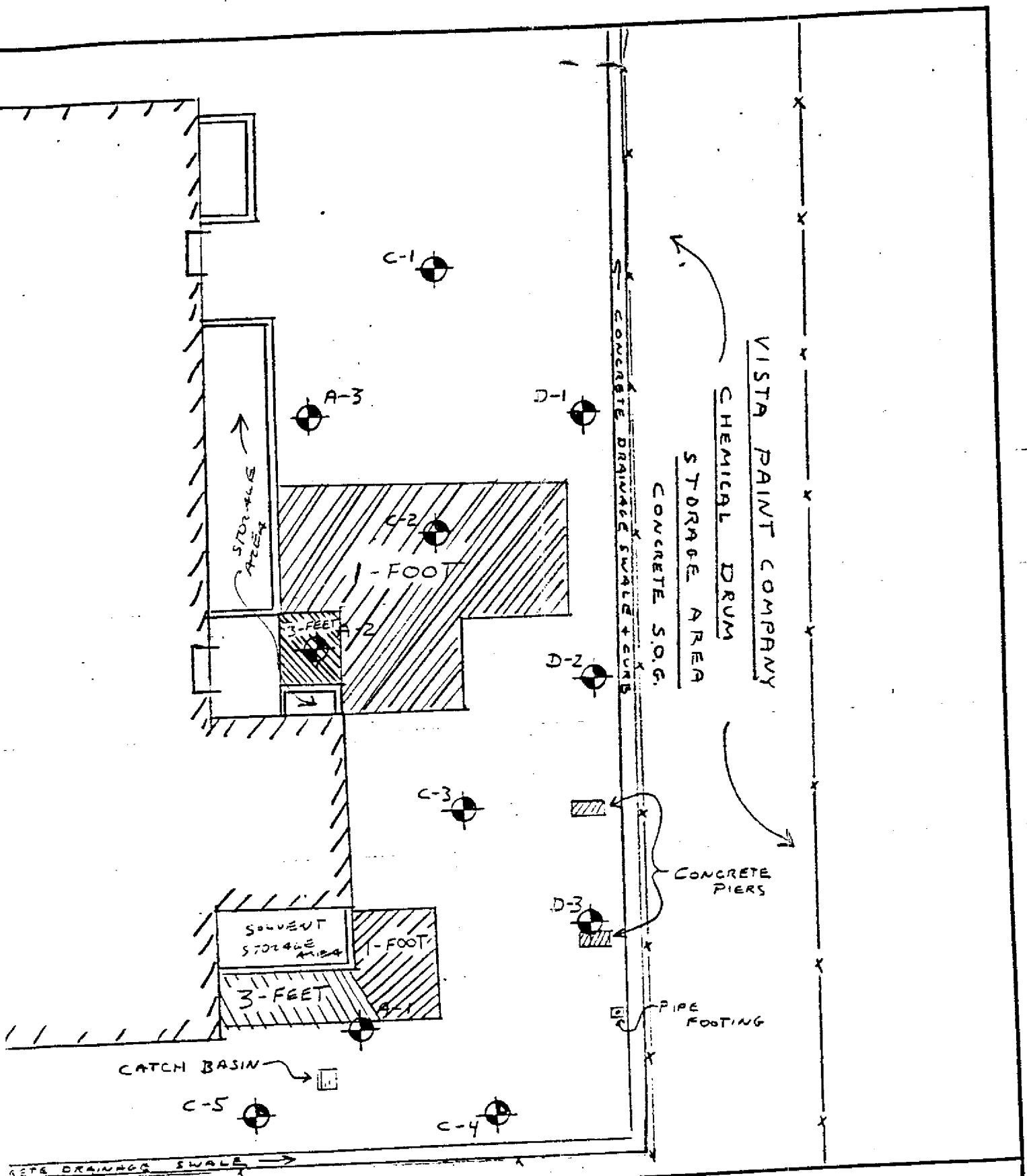
FIGURE 1



300' x 175'

TRENT TUBE
PLANT



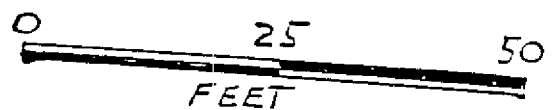
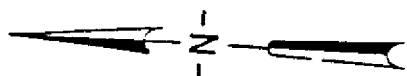


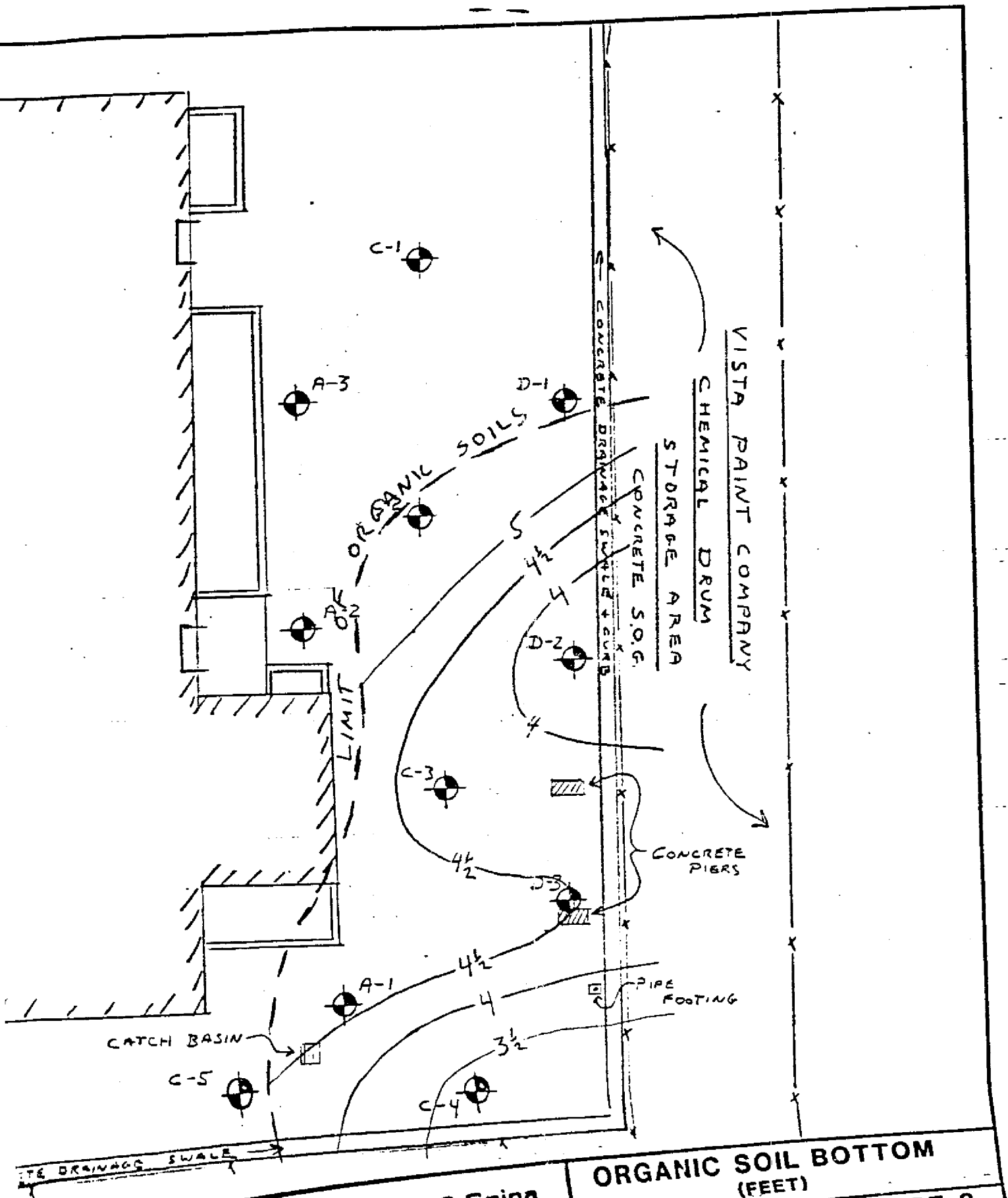
Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088


PREVIOUS SOIL REMOVAL

FIGURE 2

TRENT TUBE
PLANT





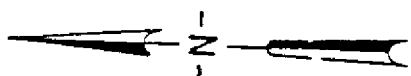


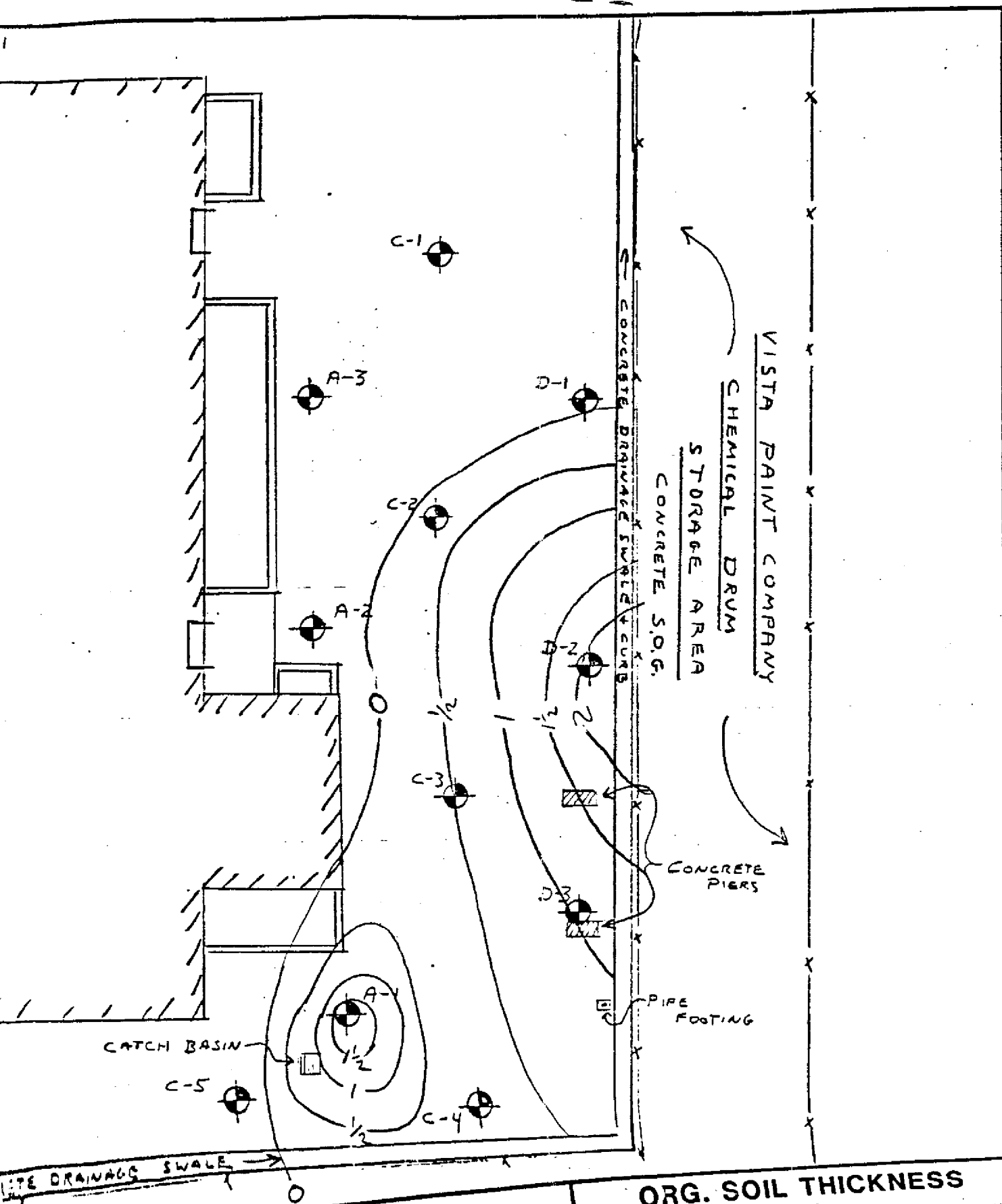
Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088

**ORGANIC SOIL BOTTOM
(FEET)**

FIGURE 3

TRENT TUBE
PLANT





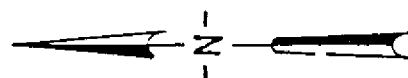
ORG. SOIL THICKNESS
(FEET)

FIGURE 4

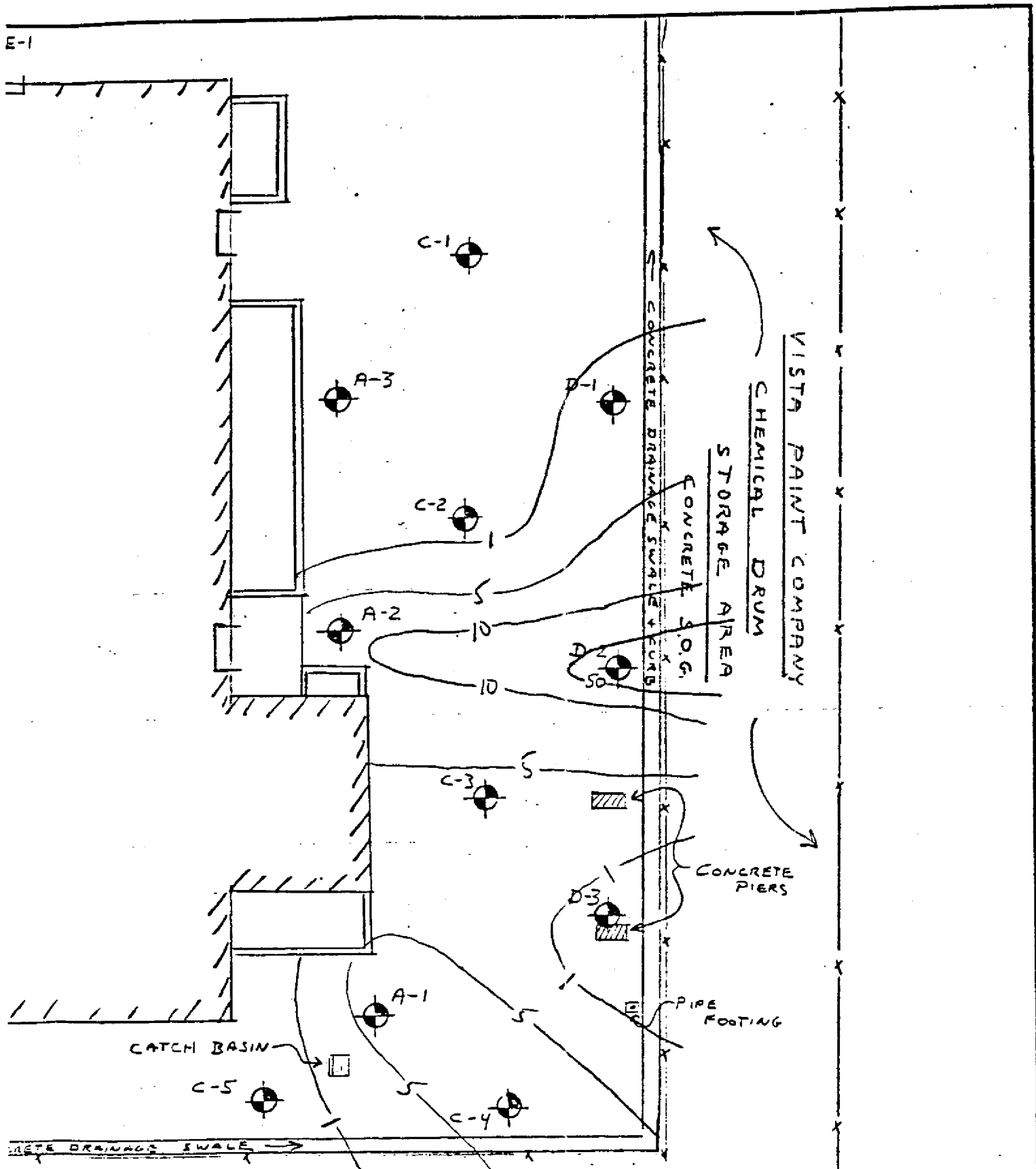


Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088

TRENT TUBE
PLANT



E-1

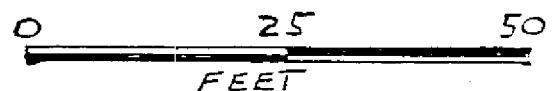
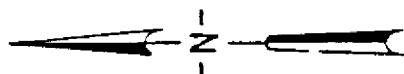


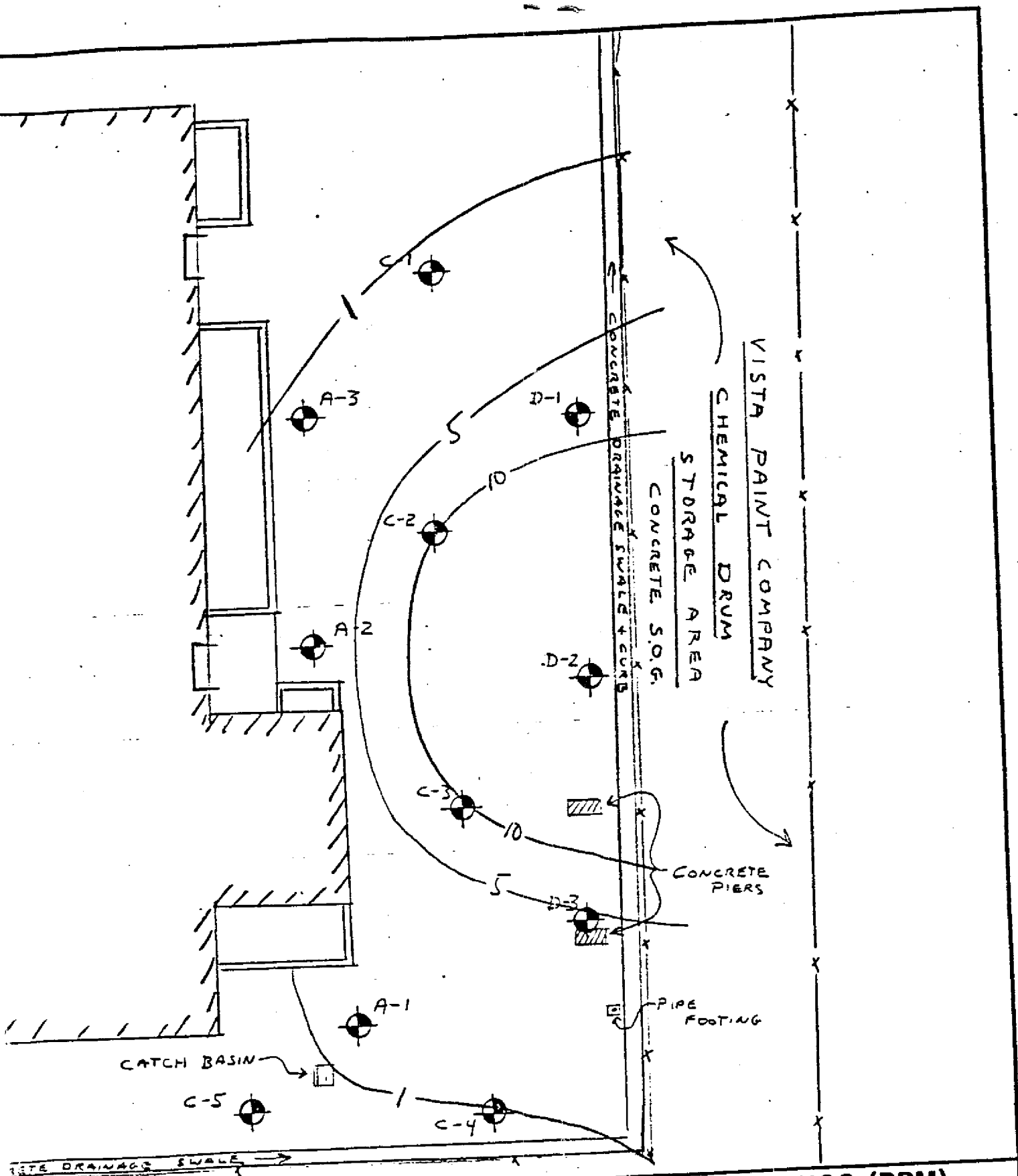
Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088

OVM READINGS (PPM)
AT 3 FEET

FIGURE 5

TRENT TUBE
PLANT



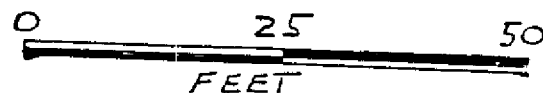
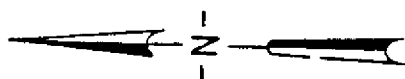


Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088

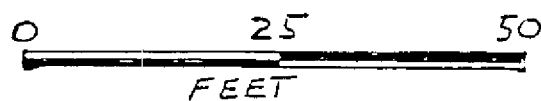
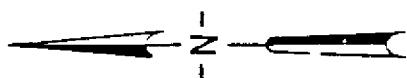
**OVM READINGS (PPM)
AT 5 FEET**

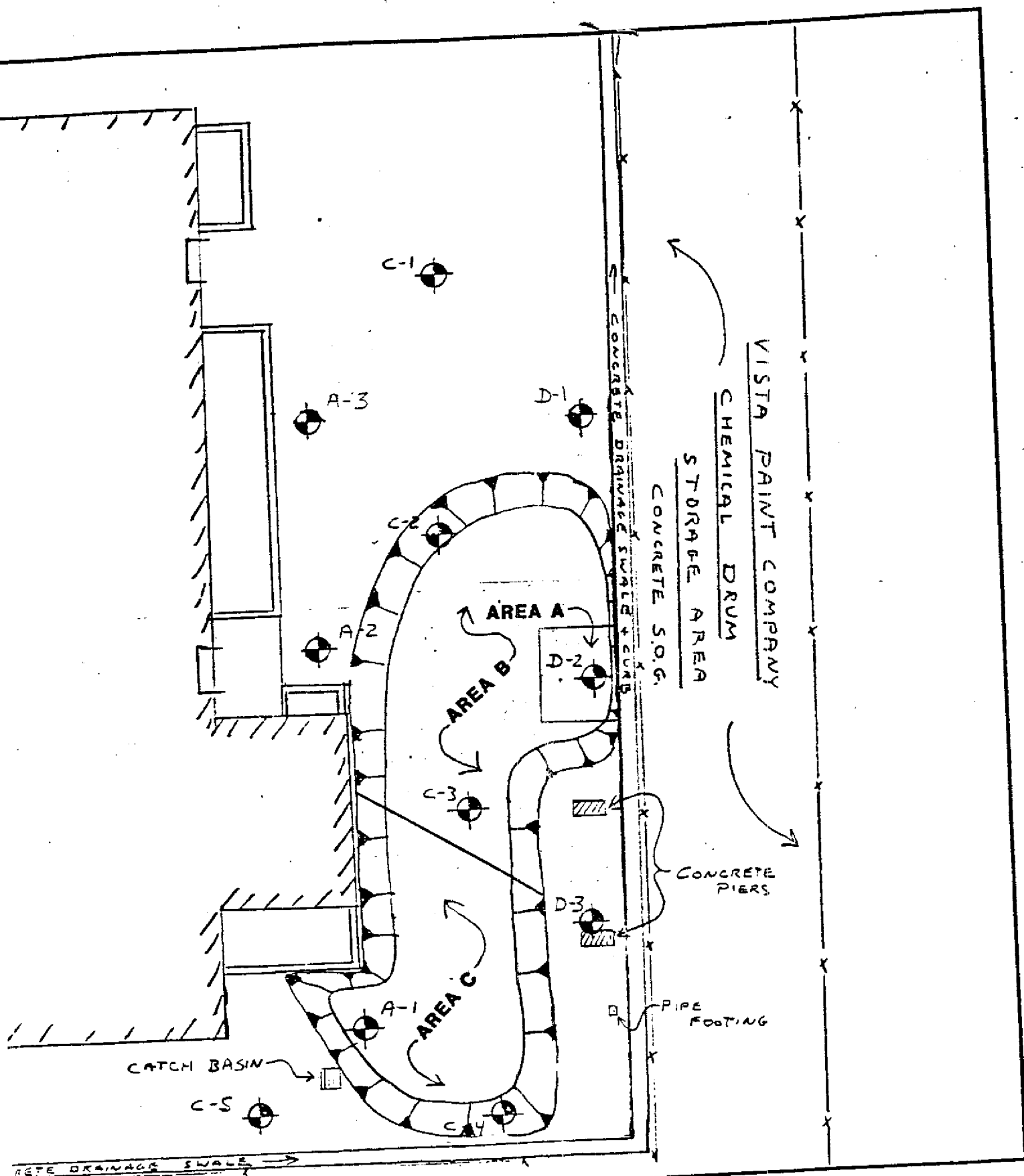
FIGURE 6

TRENT TUBE
PLANT



TRENT TUBE
PLANT





Calocerinos & Spina
CONSULTING ENGINEERS
Liverpool, New York 13088

PROPOSED REMEDIATION

FIGURE 8

APPENDIX H

CORRESPONDENCE REGARDING
AIR QUALITY BOARD EXCAVATION PERMIT



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

January 28, 1985

Mr. Fred Lettice
Supervising Engineer
South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Re: Site Remediation Plan
Trent Tube Plant
2100 East Orangethorpe Ave.
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Lettice:

In response to our telephone conversation with Mr. Robert Pease of your office on January 28, 1985, we are submitting herewith for your immediate review a copy of the Site Remediation Plan which we have filed with the California Department of Health Services. We understand that an excavation permit from the Air Quality Management District may be necessary to accomplish this remediation.

The inactive Trent Tube Facility (stainless steel manufacturing) is located within a heavily industrialized area along East Orangethorpe Avenue in Fullerton. The small (30X100 foot) area adjacent to the rear of the building to be remediated is surrounded by Vista's paint manufacturing facility and Vista's chemical storage area.

The remedial plan calls for removal of approximately three (3) truckloads of soil to a hazardous waste landfill. Discussions with the Department of Health Services indicate that the remaining soils may be removed to a Class II-1 Landfill or spread in a thin layer and allowed to aerate for a week prior to placement back in the excavation. A portable OVM would be utilized during excavation to determine if any additional materials should be also sent to a hazardous facility, as well as to monitor air quality during excavation.

Please note from Figures 5 through 7 of the Report that the OVM readings of soil samples were generally within the same order of magnitude (1-10 ppm) as the background (neighborhood) OVM readings of the air taken during our investigations. Based on the small area involved and the generally low level of organic contamination of soils, we do not believe that an air quality problem will present itself during our proposed remedial efforts.



Mr. Fred Lettice
January 28, 1985
Page 2

Trent Tube desires to complete closure of their facility prior to February 15, 1985, and requests your assistance in reaching that goal. We will be contacting you during the middle of this week to determine if the District will require a permit. Meanwhile, should you have any questions regarding this submittal, please feel free to contact the undersigned.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

Enclosure

CC: Mr. R. Phillips



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

January 18, 1985

Mr. Roy Thielking
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
197 Broadway, Room 7128
Los Angeles, California 90052

Re: Site Remediation Plan
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Thielking:

We have completed our site assessment for the above-referenced Project and present herein the results of that assessment and our proposed plan for remediation of the site.

Site Sampling

A total of 14 borings were completed as originally proposed at the rear of the facility and at background locations. An additional set of three borings (E Series) were completed at selected locations requested by you during the on-site program. Locations of all borings are indicated on the attached Site Plan (Figure 1). Drilling was conducted on December 26, 27, and 28, 1984, by Pioneer Drilling Company with inspection, sample preservation and logging conducted by Mr. David Bramwell, PG, of IT Corporation. Field supervision was performed by Mr. Andrew Diefendorf, CPG, of Calocerinos & Spina.

Soil samples were taken at approximately 3-, 5- and 10-foot depth intervals in all borings with the exception of the E Series at which location samples were obtained at approximately 2-, 4- and 6-foot depth intervals. Samples were either maintained within capped 6-inch or 4-inch California Sampler sleeves, which were then placed in polyethelene bags and stored in teflon-capped glass jars; or the samples were removed from the sampler and placed directly in laboratory-prepared, teflon-capped sample jars. All samples were refrigerated and air freighted to the analytical laboratory at the end of each day of drilling.

Results of Investigations

Attachment A presents the analytical results of all samples processed by California Analytical Laboratory. Of the 26 organic parameters included within the complete USEPA 501 and 602 scans performed, only 6 were identified on the site. Summary results of analyses for these six parameters are presented



Mr. Roy Thielking
January 18, 1985
Page 2

as Table 1. Note that of the samples analyzed at 17 locations only 3 (A-1, D-2 and C-3) indicate soil contamination above the allowable limit of 1 mg/kg at a depth of 3 feet. Only two locations (A-1 and C-4) indicated detectable contamination at a sampling depth in excess of three feet. With the exception of locations D-2 and C-3, contaminant concentrations detected were only slightly over the allowable limit.

Based on our review of previous soil removal (see Figure 2) and soil samples taken during this investigation (see Drill Logs, Attachment B), it is our opinion that the majority of contamination was removed during the original remedial efforts. Remnant contamination appears to be concentrated within a shallow (3.5- to 4.5-foot depth) zone of silty organic soil found in a limited area at the rear of the site (see Figures 3 and 4). Our past experience has shown that these fine-grained materials tend to adsorb and retain more of the solvents than the coarser and more porous underlying sand materials.

Portable organic vapor meter (OVM) readings taken during the sampling support the findings that the organic silty sand layer is retaining most of the spilled solvents. While the OVM readings indicate organic vapors dispersed throughout the relatively porous sandy deposits on the site, based on plots of OVM readings (Figures 5 through 7) at the three sample depths, two distinctive sources of contaminant are apparent. Both zones of contamination appear to result from surface runoff away from solvent storage areas in the vicinity of A-1 and A-2, respectively.

Previous excavation of soil from the area of A-2 resulted in removal of any detectable soil contamination in that area, although trace organic vapors are still present. On the other hand, the high concentration of solvents "downsurface" from A-2 at D-2 probably represents entrapment of the solvents within the organic soils immediately beneath the surficially lowest point of surface drainage between A-2 and the concrete drainage swale. The organic layer in this area is of low enough permeability to create a small pocket of trapped or perched water.

Inasmuch as fluid flow in the vadose (unsaturated) zone of the sand deposits beneath the organic layer should be vertical for approximately 80 feet (depth of water table), the spread of contamination at the rear of the site is probably directly related to surface water wash during periods of rain. Infiltrating solvent would be adsorbed by the finer-grained soil layer allowing that layer to act as a potential contaminant source during rainy periods. Note from Figures 3 and 5 that there is a strong correlation between the limits of detectable (greater than 1 ppm) OVM readings and the apparent limits of the organic silty sand layer. The significant quantity of rain prior to and during the period of this investigation may account for leaching of solvents from that layer such that detectable solvents were present at depth in a few of the borings.



Mr. Roy Thielking
January 18, 1985
Page 2

as Table 1. Note that of the samples analyzed at 17 locations only 3 (A-1, D-2 and C-3) indicate soil contamination above the allowable limit of 1 mg/kg at a depth of 3 feet. Only two locations (A-1 and C-4) indicated detectable contamination at a sampling depth in excess of three feet. With the exception of locations D-2 and C-3, contaminant concentrations detected were only slightly over the allowable limit.

Based on our review of previous soil removal (see Figure 2) and soil samples taken during this investigation (see Drill Logs, Attachment B), it is our opinion that the majority of contamination was removed during the original remedial efforts. Remnant contamination appears to be concentrated within a shallow (3.5- to 4.5-foot depth) zone of silty organic soil found in a limited area at the rear of the site (see Figures 3 and 4). Our past experience has shown that these fine-grained materials tend to adsorb and retain more of the solvents than the coarser and more porous underlying sand materials.

Portable organic vapor meter (OVM) readings taken during the sampling support the findings that the organic silty sand layer is retaining most of the spilled solvents. While the OVM readings indicate organic vapors dispersed throughout the relatively porous sandy deposits on the site, based on plots of OVM readings (Figures 5 through 7) at the three sample depths, two distinctive sources of contaminant are apparent. Both zones of contamination appear to result from surface runoff away from solvent storage areas in the vicinity of A-1 and A-2, respectively.

Previous excavation of soil from the area of A-2 resulted in removal of any detectable soil contamination in that area, although trace organic vapors are still present. On the other hand, the high concentration of solvents "downsurface" from A-2 at D-2 probably represents entrapment of the solvents within the organic soils immediately beneath the surficially lowest point of surface drainage between A-2 and the concrete drainage swale. The organic layer in this area is of low enough permeability to create a small pocket of trapped or perched water.

Inasmuch as fluid flow in the vadose (unsaturated) zone of the sand deposits beneath the organic layer should be vertical for approximately 80 feet (depth of water table), the spread of contamination at the rear of the site is probably directly related to surface water wash during periods of rain. Infiltrating solvent would be adsorbed by the finer-grained soil layer allowing that layer to act as a potential contaminant source during rainy periods. Note from Figures 3 and 5 that there is a strong correlation between the limits of detectable (greater than 1 ppm) OVM readings and the apparent limits of the organic silty sand layer. The significant quantity of rain prior to and during the period of this investigation may account for leaching of solvents from that layer such that detectable solvents were present at depth in a few of the borings.



Mr. Roy Thielking
January 18, 1985
Page 3

It should also be noted that no solvents were detectable at depth in areas where the stratigraphic section of sand is void of any silty organic containing layers. In these areas of relatively clean coarse sand there is very little particle surface upon which the solvent can be retained. Any solvent reaching depth in these areas has already escaped and, if it were not for the limited presence of an organic layer, no solvents would probably be currently detectable on the site.

The key to remediation of this site, therefore, becomes (1) removal of the primary source of contamination, the organic soil layer, and (2) prevention of further migration of any small quantities of solvent contained in deeper sands by elimination of surface water infiltration.

Controlling factors in the practicality of applied methods of remediating this site include (1) the proximity of various structures and (2) the potential low angle of repose of any sands which are excavated. Removal of soils in close proximity to structures may threaten the stability of those structures.

Proposed Additional Remediation

Because some remnant soil contamination is still present at the rear of the site, we recommend the following remedial actions:

1. Removal of all heavily contaminated soils outlined in Area "A" of Figure 8 to a depth of 4.5 feet (vertically, if possible) and transport to an approved disposal facility. This represents all contaminated soils within an approximately eight-foot radius of D-2.
2. Removal of all soils in Areas "B" and "C" (side slopes of 1:1.5, if possible) to the base of the organic layer (3.5 to 4.5 feet in depth). Note that these areas were delineated by overlay analysis of Figure 3 and 5.
3. All soils excavated from Areas "B" and "C" to be loosely spread in a selected area on the east side of the site in a layer not to exceed four inches in thickness and allowed to aerate for a minimum of one week.
4. Replacement of aerated soils back in excavation in compacted lifts not to exceed one-foot in thickness and redressing to ground surface with a minimum of four inches of approved gravel base.



Mr. Roy Thielking
January 18, 1985
Page 4

In addition, we recommend removal of solvent-stained soils along the embankments of the drainage swale at E-2 to a depth of six inches with disposal at an approved disposal site, and replacement of soils with granular (gravel) materials.

It is assumed that the volumes of soil to be removed as proposed may be the minimum necessary. In order to assess actual soil conditions encountered during remediation, we would utilize a portable OVM to determine if all pockets of significant contamination have been removed and if additional removal is required at time of excavation.

In order to facilitate successful closure of this facility, we request your immediate review and comment on this Proposal. Thank you in advance for your assistance in this matter.

Respectfully submitted,

CALOCERINOS & SPINA

A handwritten signature in black ink, appearing to read 'Andrew F. Diefendorf'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

AFD:mts

CC: Mr. R. Phillips (w/enc)

TABLE 1
TRENT TUBE
FULLERTON, CALIFORNIA

RESULTS OF ANALYSES

Sample Point	Depth (feet)	Contaminant Concentration in mg/kg (parts per million)					
		Method 601			Method 602		
		1,1,1-Tri-chloroethane	Tetrachloro-ethylene	Trichloro-ethylene	Ethyl-Benzene	Xylene	Toluene
A-1	3.5	1.2	1.1	LTD	1.7	2.7	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	1.5	1.7	LTD	LTD	LTD	LTD
A-2	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
A-3	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
A-4	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
B-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
B-2	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
B-3	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
C-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	--	--	--	--	--	--
	10.5	--	--	--	--	--	--
C-2	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	--	--	--	--	--	--
	10.5	--	--	--	--	--	--
C-3	3.5	2.2	5.3	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD

Table 1 (Continued)
Page 2

Sample Point	Depth (feet)	Contaminant Concentration in mg/kg (parts per million)					
		Method 601			Method 602		
		1,1,1-Tri-Chloroethane	Tetrachloro-ethylene	Trichloro-ethylene	Ethyl-Benzene	Xylene	Toluene
C-4	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	1.1
D-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	--	--	--	--	--	--
	10.5	--	--	--	--	--	--
D-2	3.5	780	21	70	LTD	95	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
D-3	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	5.0	LTD	LTD	LTD	LTD	LTD	LTD
	10.5	LTD	LTD	LTD	LTD	LTD	LTD
E-1	3.5	LTD	LTD	LTD	LTD	LTD	LTD
	4.0	--	--	--	--	--	--
	6.0	--	--	--	--	--	--
E-2	2.0	LTD	LTD	LTD	LTD	LTD	LTD
	4.0	--	--	--	--	--	--
	6.0	--	--	--	--	--	--
E-3	2.0	LTD	LTD	LTD	LTD	LTD	LTD
	4.0	--	--	--	--	--	--
	6.0	--	--	--	--	--	--

NOTES:

1. LTD = Less Than Detectable limit of 0.5 mg/kg.
2. -- = Sample Not Analyzed



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

January 28, 1985

Mr. Roy Thielking
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
197 Broadway, Room 7128
Los Angeles, California 90052

Re: Site Remediation Plan
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Thielking:

In response to our phone conversation of Friday, January 25, 1985, we have discussed the above-referenced Remediation Plan with the South Coast Air Quality Management District. We are providing that office with a copy of the Remediation Plan for review to determine if an excavation permit will be necessary.

Dependent upon the needs of the District, we will either (1) spread for aeration those soils not requiring disposal at a hazardous waste facility or (2) transport those low level contaminated soils to a Class II-1 facility.

Inasmuch as your Department seems to be in general agreement with our Remedial Plan, we are in need of written approval or contingent approval of that Plan. Please let us know if you are in need of any further submittals by us at this time.

Very truly yours,

CALOCERINOS & SPINA

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

AFD:mts

CC: Mr. R. Phillips



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 1, 1985

Mr. Roy Thielking
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
197 Broadway, Room 7128
Los Angeles, California 90052

Re: Site Remediation Plan
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Thielking:

Please find enclosed for your review one (1) copy of our Excavation Plan for the SCAQMD Permit Application for closure of the above-referenced facility.

As discussed, we have scheduled a meeting with you and a representative of your office, the Owner, the Contractor and C&S at the offices of the SCAQMD (9150 Flair Drive, Elmonte, California) on Thursday, February 7, 1985, at 2:30 p.m.

It is our desire to finalize, at that meeting, any necessary changes to the Excavation Permit in order that we may obtain that Permit and receive Department of Health Services approval of the Closure Plan by the end of the week and be able to initiate excavation on Monday, February 11, 1985.

We look forward to meeting with you at that time.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

Enclosure

CC: Mr. R. Phillips



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 1, 1985

Mr. Fred Lettice
Supervising Engineer
South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Re: Site Remediation Plan
Trent Tube Plant
2100 East Orangethorpe Ave.
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Lettice:

Please find attached for your review one (1) copy of the Excavation Permit Narrative for the above-referenced Project. Copies of the signed Application are being forwarded by the Owner and should be delivered to your offices by Tuesday, February 5, 1985.

As discussed with Mr. Pease of SCAQMD, we have scheduled a meeting at your offices for Thursday, February 7, 1985, at 2:30 p.m. to discuss the Permit Application and the Site Closure Plan with representative of your agency, Mr. Thielking of the Department of Health Services, the Owner, and the Excavation Contractor. It is our desire to have all approvals and Permits in hand by the end of the week in order to initiate excavation on Monday, February 11, 1985.

Should you have any questions or require further information for the Permit narrative, please contact the undersigned. Your assistance in this matter is greatly appreciated.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

Enclosure

CC: Mr. R. Phillips

SCAQMD EXCAVATION PERMIT APPLICATION PLAN NARRATIVE

AND

CDHS SITE CLOSURE PLAN AMENDMENT

Submitted to:

South Coast Air Quality Monitoring District
and
California Department of Health Services

For:

Trent Tube Plant
2100 East Orangethorpe Avenue
Fullerton, California

CAD 008325110

By:

CALOCERINOS & SPINA
CONSULTING ENGINEERS
1020 Seventh North Street
Liverpool, New York 13088

February 1985

AQMD EXCAVATION PLAN NARRATIVE

General

This narrative is submitted to satisfy the combined requirements of the California Department of Health Services (CDHS) for facility closure and the excavation permit requirements of the South Coast Air Quality Monitoring District (SCAQMD). The original Closure Plan (PLAN) was submitted to the CDHS and SCAQMD on January 18 and 28, 1985, respectively. That PLAN should be referenced as the primary Closure and Excavation Plan. For purposes of brevity, this narrative should be reviewed as an Amendment to the PLAN.

Based on discussions with Mr. Thielking of CDHS and Mr. Pease of SCAQMD, we propose the methods of soil excavation, removal, treatment, monitoring and management as described below.

Soil Remediation and Quantities

Approximately 20 to 40 cubic yards (cy) of moderately 1,1,1-Trichloroethane (TCE) contaminated (2 to 780 ppm) soil in the vicinity of Boring D-2 (Figure 1A) will be removed from the site as presented in the original PLAN (Area 1 of Figure 8). This soil will be transported under manifest along with oil-stained surface soils in the vicinity of Boring E-2 to a Class-1 facility for disposal. Note that no vinyl chloride was used at the facility and none was detected in the organic scans of samples obtained.

Approximately 450 cy of lightly TCE contaminated (less than 2 ppm) soil as outlined in the original PLAN as Areas 2 and 3 will be excavated and spread in a four-inch layer in an area on the east side of the property as outlined in Figure 1A. This soil will be allowed to aerate for a period up to one week prior to placement back in the excavated areas.

Monitoring During Excavation

During excavation a portable organic vapor meter (OVM) will be utilized to determine if additional soils will require transport to a Class 1 facility. In addition, background air and soil readings will be obtained with the OVM to determine if the work is affecting the air quality in the vicinity of the excavation. Should levels of volatiles increase above ambient air quality, then excavation will cease until levels have dropped.

Organic Vapor Sampling

Approximately 30 soil samples in the vicinity of the 3,000 s.f. area to be excavated has been tested both analytically (USEPA 601 and 602 scans) as well as by OVM (see Original Plan). Based on these results it is estimated that the volume of soils to be excavated and trucked from the site contain approximately a maximum 0.5 gallons of TCE.

It should be noted that no vapor problems were reported during previous efforts which removed the majority of contaminated soils from the facility during the summer of 1984. Recent OVM readings at the location to be excavated indicated no detectable elevation in the ambient air levels derived from the soils on the site.

Excavation and Transportation

Excavation and loading into trucks for off-site disposal will be accomplished utilizing a front-end and skip loader. Excavation will not be conducted on days when the SCAQMD forecasts 1st, 2nd or 3rd stage episodes for the area where the excavation will occur. Excavation will not be conducted on days when the wind velocity is greater than 15 mph average or 25 mph gusts. Trucks will be provided with plastic box liners to encapsulate the soil. An impermeable tie-down tarpaulin will also be required for each truck leaving the site. It is estimated that only three truckloads will be required to transport materials from the site.

Monitoring and Control of Soil Spreading

During spreading of soils to be aerated, the OVM will be utilized to monitor any changes in ambient air quality. Based on previous soils analyses the estimated maximum possible volume of TCE contained within the 450 cy of soils to be aerated is approximately 0.2 gallons. No changes in vapor readings should, therefore, be detectable at the aeration area. Should elevated levels be determined, the rate of transport and spreading can be slowed. Inasmuch as the materials to be excavated and spread generally consist of moist medium to coarse sands, dust problems also are not anticipated. However, should dust or windblown particulates present a problem during spreading, a light application of water utilizing spray hoses will be accomplished. This method of dust control will be minimized to a misting operation in order to prevent leaching of TCE from the sand.

Agreement to Cease Operation

The owner agrees that excavation and spreading operations will be immediately ceased, if he has been informed by the Executive Officer of SCAQMD that a public nuisance has occurred.

Contingent Plans

Should the aeration of the soils prove to be the sole source of public nuisance, it is proposed that those soils to be aerated will be removed from the site to a Class II-1 facility in the same manner as the soils removed to the Class I facility.

Respectfully submitted,

TRENT TUBE DIVISION

Robert Phillips
Assistant Vice President
Finance and Administration

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
9150 Flair Drive El Monte, CA 91731

APPLICATION FOR PERMIT TO CONSTRUCT AND PERMIT TO OPERATE AND EXCAVATE
FOR FEE INFORMATION AND SMALL BUSINESS EXEMPTION
SEE REVERSE SIDE

PLEASE TYPE OR PRINT

SCAQMD USE

1A. PERMIT TO BE ISSUED TO:

Trent Tube Division, Crucible Material Corporation

BUSINESS LICENSE NAME OF ORGANIZATION THAT IS TO RECEIVE PERMIT

SEC TS ID NUMBER

1B.

Colt Industries, Inc.

NAME (OR NAMES) OF OWNER OR PRINCIPAL PARTNERS DOING BUSINESS AS (DBA) ABOVE ORGANIZATION

2A. MAILING ADDRESS

2188 So. Church Street, East Troy, Wisconsin

2B.

53120

NUMBER STREET CITY OR COMMUNITY STATE

ZIP CODE

3A. EQUIPMENT LOCATION (IF SAME ENTER "SAME")
Excavation at
2100 East Orangethorpe Avenue, Fullerton, Calif. 92631

3B.

State College Blvd.

NUMBER STREET CITY OR COMMUNITY ZIP

NEAREST INTERSECTING STREET

4A. CONTACT PERSON (INITIALS & NAME)

Robert Phillips

4B. CONTACT PHONE NO. (AREA & NO.)

414 642-7321

5. EQUIPMENT. APPLICATION IS HEREBY MADE FOR PERMIT TO OPERATE THE FOLLOWING EQUIPMENT.

Excavation Permit per Rule 1150

6. IF THIS EQUIPMENT HAD A PREVIOUS WRITTEN PERMIT, STATE NAME OF CORPORATION, COMPANY, OR INDIVIDUAL OWNER THAT OPERATED THIS EQUIPMENT, AND STATE PREVIOUS AIR POLLUTION CONTROL DISTRICT PERMIT NUMBER

NAME

PREVIOUS PERMIT NUMBER

7. PERMIT APPLICATION FOR EQUIPMENT

REINSTATE NON-PAYMENT P.O.

FEES DUE ☐

NEW CONSTRUCTION ☐

CHANGE OF OWNERSHIP ☐

ALTERATION ☐

EXISTING EQUIPMENT IN OPERATION ☐

CHANGE OF LOCATION ☐

WITHOUT PRIOR PERMIT ☐

Excavation

CHANGE OF CONDITIONS ☐

8. TYPE OF ORGANIZATION

CORPORATION ☒

STATE AGENCY ☐

PARTNERSHIP ☐

FEDERAL AGENCY ☐

INDIVIDUAL OWNER ☐

UTILITY ☐

LOCAL GOV'T AGENCY ☐

9. ESTIMATED COST OF EQUIPMENT OR ALTERATION

BASIC EQUIPMENT \$ Excavation \$20,000

AIR POLLUTION

CONTROL EQUIPMENT \$

10. FOR THE NEW CONSTRUCTION, ALTERATION, TRANSFER OF OWNERSHIP OR LOCATION, WHAT IS

Excavation

ESTIMATED STARTING DATE? 2/11/85

ESTIMATED COMPLETION DATE? 2/15/85

11. GENERAL NATURE OF BUSINESS

Seamless and welded tubing
Manufacturing

12. PRINCIPAL PRODUCT

Stainless Steel Tubing

13. DO YOU CLAIM CONFIDENTIALITY OF DATA?

YES ☐

NO ☒

IF YES STATE NATURE OF DATA ON SEPARATE SHEET

14. NORMAL OPERATING HOURS
OF SUBJECT EQUIPMENT

HOURS/DAY 8

DAYS/WEEK 5

WEEKS/YEAR 1

15. HAS A CEGA DOCUMENT BEEN PREPARED FOR
THIS PROJECT? YES ☐ NO ☒

15a. ARE ALL COMPANIES' FACILITIES IN CALIFORNIA
IN COMPLIANCE WITH AIR POLLUTION RULES?

YES ☒

NO ☐

16. SIGNATURE OF RESPONSIBLE MEMBER OF ORGANIZATION

17. OFFICIAL TITLE OF SIGNER

Assistant Vice President
of Finance and Administration

18. TYPED OR PRINTED NAME OF SIGNER

Robert Phillips

19. PHONE NO.

414 642-7321

20. DATE

2/2/85

SIC NO

EQUIP CAT NO

SCH. STEP

APPLICATION NO.

PERMIT NO.

TYPE

B OR C

WORK UNITS

A C P O

ASSIGNMENT

UNIT

ENGR

CLASS

I III

VALIDATION

FILING FEE

\$

CHECK OR MONEY ORDER NO.



**South Coast
AIR QUALITY MANAGEMENT DISTRICT**
9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

February 5, 1985

Trent Tube Company
2100 East Orangethorpe Avenue
Fullerton, California

Att: Robert Phillips
Assistant Vice President

Gentlemen:

RULE 1150 EXCAVATION PERMIT

Reference is made to your application for a Rule 1150 excavation permit for the excavation of 40 yd³ and the aeration of 500 yd³ from the southwest area of the Trent Tube Plant property located in Fullerton, California.

Please be advised that this excavation permit is granted under Rule 1150 of the Rules and Regulations of the South Coast Air Quality Management District and is subject to the following conditions:

1. This excavation permit is valid until March 1, 1985. An extension may be granted upon request.
2. This District shall be notified in writing when the excavation begins and when it is terminated.
3. Areas A, B, and C are the locations as identified in your Rule 1150 application.
4. Only material excavated from Areas B and C may be aerated.
5. All excavated material that is aerated shall be watered until the surface is moist and then maintained in a moist condition to prevent dusting.
6. Any spreading of material to neutralize the soil from areas B and C shall be done in a manner to minimize emissions.
7. All material that is excavated from area A must be immediately placed in trucks or trailers which will be used to transport the material.
8. During excavation, if a considerable number of complaints are received, all work shall cease and approved mitigation measures shall be implemented immediately.

9. During excavation, monitoring for organics as methane shall be conducted at the property line at a location downwind from the excavation site. If the monitoring results indicate that the ambient concentration reaches 150ppm, all excavation shall cease and the approved mitigation measures implemented.
10. During excavation, all dirt working areas, excavated material, and dirt roadways shall be watered until the surface is moist and then maintained in a moist condition to reduce dust.
11. Excavation shall not be conducted on days when the SCAQMD forecasts second or third stage episodes for the area where the excavation will occur.
12. Excavation shall not be conducted on days when the wind velocity is greater than 15 m.p.h. average or 25 m.p.h. gusts.
13. During loading and transport, no material shall extend above the sides or rear of the truck or trailer which will haul the excavated material.
14. The exterior of trucks hauling excavated material must be cleaned off prior to leaving the excavation site.
15. All excavated solid materials shall be transported in trucks which are covered with an impermeable cover, with such covers tied down.
16. The asphalt pad used to aerate the material excavated from areas B and C shall be completely cleaned free of all excavated material after aeration is complete to prevent fugitive dust emissions.
17. If hazardous material or organic liquids are encountered during the excavation in concentrations greater than those reported in the core samples, excavation must cease and the District notified. Additional mitigation measures as deemed necessary by the District must be implemented prior to resuming excavation.
18. All excavation material must be transported in such a manner as to prevent any emissions of hazardous materials.
19. All hazardous materials shall be transported in containers clearly marked as to the type(s) of material contained and what procedures should be followed in case of accidental spills.
20. During the transport of hazardous material(s), if a spill occurs, the immediate area may be evacuated and monitors set up downwind. The evacuated area shall then be extended to the point at which ambient levels are considered safe.
21. Mitigation measures, other than those indicated in these conditions, which are deemed appropriate by the Executive Officer as necessary to protect the comfort, repose, health or safety of the public, shall be implemented upon request.

February 5, 1985

22. All materials that are listed as hazardous by a Federal or State agency shall be considered "hazardous materials" for the purpose of this permit.
23. Other governmental agencies may require approval before any excavation begins. It shall be the responsibility of the applicant to obtain that approval.

The South Coast Air Quality Management District shall not be responsible or liable for any losses because of measures required or taken pursuant to the requirements of this approved excavation management plan.

If you have any questions concerning this permit, please call Robert Pease at (818) 572-6174.

Very truly yours,

Sanford M. Weiss
Director of Engineering



Fred E. Lettice
Supervising Engineer

RP:tdb



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 11, 1985

South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Attn: Mr. Fred Lettice
Supervising Engineer

Re: Air Quality Permit
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Gentlemen:

In accordance with your Letter Permit of February 5, 1985, please be advised that we intend to initiate excavation at the Trent Tube Plant site on Monday, February 11, 1985.

Should you have any questions regarding this matter, please contact Mr. Robert Phillips of Trent Tube, East Troy, Wisconsin.

Very truly yours,

CALOCERINOS & SPINA

RWK:mts

CC: Mr. R. Phillips

Richard W. Klippel, P.E.
Industrial Waste Manager



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 20, 1985

South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Attn: Mr. Fred Lettice
Supervising Engineer

Re: Air Quality Permit
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Gentlemen:

In accordance with your Letter Permit of February 5, 1985, please be advised that we initiated excavation at the Trent Tube Plant site on Monday, February 11, 1985.

Because formal agreement could not be reached with the California Department of Health Services regarding the Remedial Program, the Project was placed on "Hold" late in the morning of February 11, 1985. Once agreement has been made we plan to complete remediation and will notify you of our intended date of re-initiation.

This work may extend past March 1, 1985, thus requiring an extension of our Permit. Please let us know what we will need to provide you in order to obtain an extension.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Andrew F. Diefendorf
Applied Geoscience Manager

CC: Mr. R. Phillips



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 27, 1985

South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Attn: Mr. Fred Lettice
Supervising Engineer

Re: Air Quality Permit
Trent Tube Plant
Fullerton, California
CAD 008325110

File: 469.003

Gentlemen:

In accordance with your Letter Permit of February 5, 1985, please be advised that we re-initiated excavation at the Trent Tube Plant site on Monday, February 25, 1985.

All soil excavation and replacement work is planned to be completed on Friday, March 1, 1985. We therefore do not anticipate a request for an SCAQMD Permit Extension.

At this time we would like to thank you and your staff for your courtesy and cooperation in assisting us to reach a timely conclusion to this Facility closure.

Very truly yours,

CALOCERINOS & SPINA

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

AFD:mts

CC: Mr. R. Phillips



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

March 4, 1985

Mr. Fred Lettice
Supervising Engineer
South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Attn: Mr. R. Pease

Re: Site Remediation Plan
Trent Tube Plant
2100 East Orangethorpe Ave.
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Lettice:

This letter is to notify you that all remedial excavation, aeration and soil replacement work was completed at the above-referenced Facility on Friday, March 1, 1985.

Our Supervising Geologist has informed us that weather conditions were ideal and that no fugitive dust conditions or air-quality monitoring problems arose.

Again, we wish to thank you for your timely cooperation in assisting us with this closure.

Very truly yours,

CALOCERINOS & SPINA

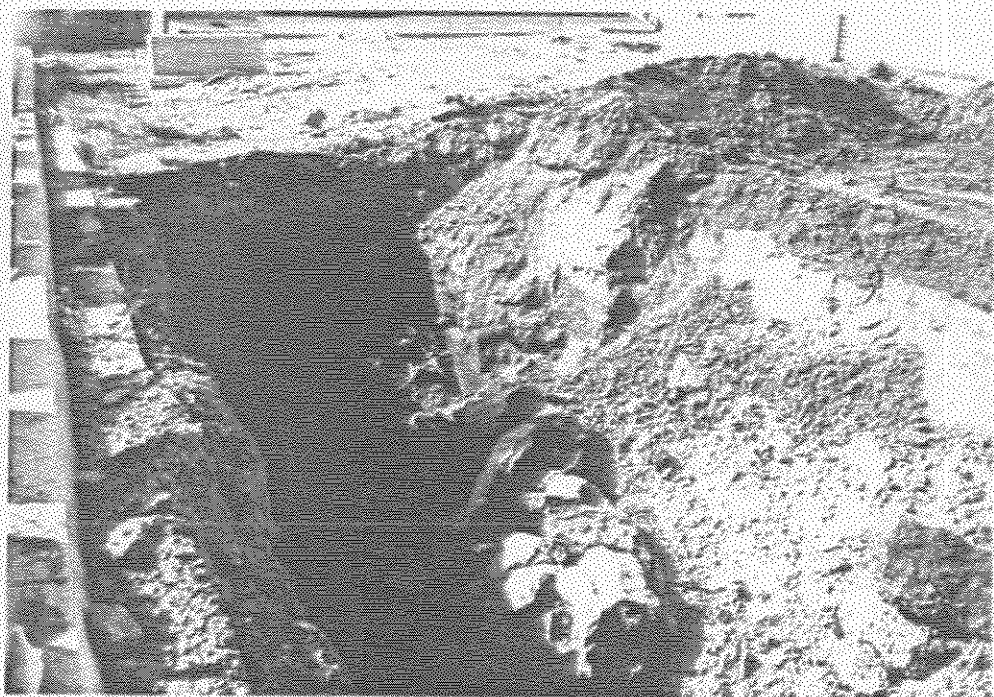
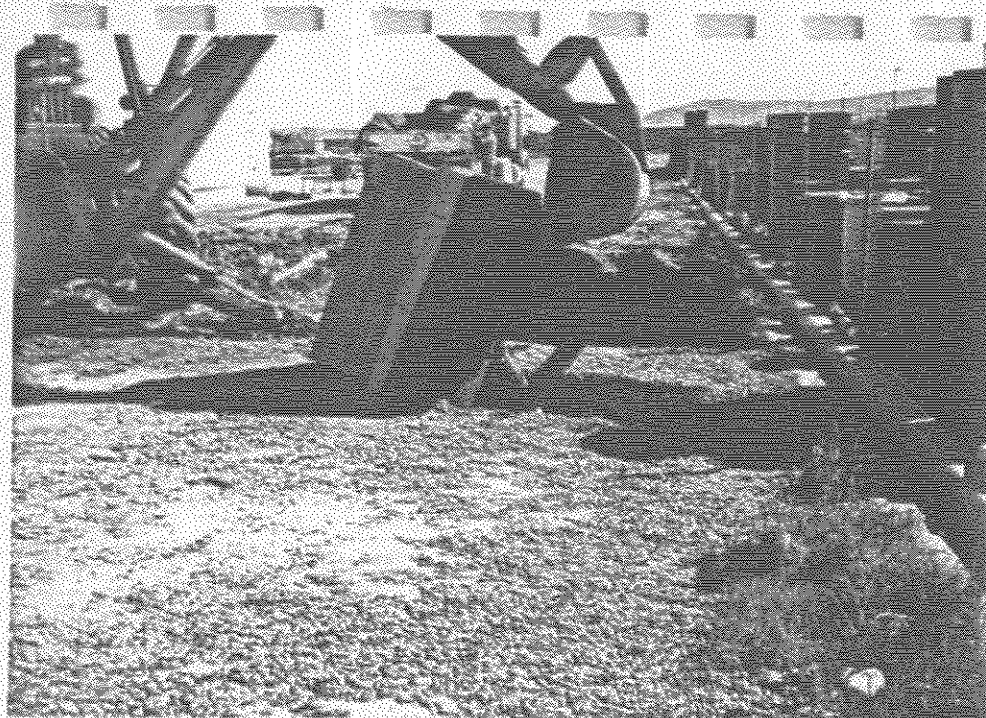
AFD:mts

CC: Mr. R. Phillips

Andrew F. Diefendorf, CPG
Manager, Applied Geoscience

APPENDIX I

PHOTOS OF EXCAVATION AND
MANIFEST FORMS SHOWING DISPOSAL
OF EXCAVATED SOILS SHIPPED TO DISPOSAL
DURING REMEDIATION WORK - FEBRUARY 11, 1985



GENERATOR COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Grangerhorpe Fullerton, Ca 92634		6. US EPA ID Number CA0980214883	A. State Manifest Document Number 84582038		
4. Generator's Phone () 714-632-0181		8. US EPA ID Number	B. State Generator's ID		
5. Transporter 1 Company Name J.CAL. TRANSPORTATION		10. US EPA ID Number	C. State Transporter's ID 53584		
7. Transporter 2 Company Name			D. Transporter's Phone 714-920-7725		
9. Designated Facility Name and Site Address Casmalia Resources NTU Road Casmalia, Ca 93429			E. State Transporter's ID		
			F. Transporter's Phone		
			G. State Facility's ID		
			H. Facility's Phone 805-937-8419		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	1. Waste No.
a. Hazardous Waste Solid nos		No.	Type	Unit	
b. CEM-E NA 9189		001	DR	15	611
c.					
d.					
J. Additional Descriptions for Materials Listed Above Per EPA 601+602 SCANS - SANDS containing 0-780 mg/kg 1,1,1 Trichloroethane 0-21 mg/kg Trichlorobenzene 0-20 mg/kg Trichloroethylene 0-17 mg/kg Styrene 0-95 mg/kg Benzene 0-11 mg/kg Toluene		K. Handling Codes for Wastes Listed Above 03			
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name HARDY L. MURPHY		Signature <i>Hardy L. Murphy</i>		Date 12/1/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Tammy M. Rain</i>		Date 02/11/85	
Printed/Typed Name TAMMY M. RAIN		Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. 39899-23480					
Printed/Typed Name Casmalia Resources		Signature <i>Michele B. Priest</i>		Date 12/11/85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. KAD0083251146884	Manifest Document No. 4	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address TRENT TUBE Fullerton, CA 92634				A. State Manifest Document Number 84582041		
4. Generator's Phone 714-632-0181				B. State Generator's ID		
5. Transporter 1 Company Name J Cal Trans.		6. US EPA ID Number KAD980814833		C. State Transporter's ID 52527		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 713-9207107		
9. Designated Facility Name and Site Address Casmalia NTU Road Casmalia, CA 93419		10. US EPA ID Number KAD020748125		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID CAD020748125		
				H. Facility's Phone 805-937-8449		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	1. Waste No.	
a. ORM-E Hazardous Waste Solid as NA989		No.	Type			
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above SAND CONTAINING PER EPA SCANS 601 & 602 IN M³/K³ 0-780 1,1,1-Trichloroethane 0-1.1 Toluene 0-21 Tetrachloroethylene 0-95 Styrene 0-70 Trichloroethylene 0-1.7 Ethylbenzene				K. Handling Codes for Wastes Listed Above 03		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name HARRY L. MURPHY		Signature <i>Harry L. Murphy</i>		Date Month Day Year 12/11/85		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Glenn Small</i>		Date Month Day Year 12/11/85		
Printed/Typed Name Glenn Small		Signature		Date Month Day Year		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date Month Day Year		
Printed/Typed Name		Signature		Date Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. 39929-32100 lbs						
Printed/Typed Name CASMALIA RESOURCES		Signature <i>D. M. Kirkade</i>		Date Month Day Year 12/11/85		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92634		4. Generator's Phone 714-632-0181	5. Transporter 1 Company Name J. Cal TRANS	6. US EPA ID Number KAD940414893	A. State Manifest Document Number 84582042
7. Transporter 2 Company Name		8. US EPA ID Number	9. Designated Facility Name and Site Address Casalia Resources NTU Road Casalia, Ca 93429		B. State Generator's ID
10. US EPA ID Number C.A.D.O.2.0.7.4.8.1.2.5		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		C. State Transporter's ID 54046	D. Transporter's Phone 714-720-7707
12. Containers		13. Total Quantity	14. Unit	L. Waste No.	
No. Type		Quantity		Wt/Vol	
a. Hazardous Waste Solid non ORM-E NA 9189		14		611	
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
Per EPA 601 + 602 Scan - Solves containing in Myky 0-500 1,1,1 Trichloroethane 0-21 1,1,2 Trichloroethane 0-70 Trichloroethylene 0-17 Ethylbenzene 0-95 Toluene 0-11 Toluene					
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name HARRY L MURPHY		Signature Harry L Murphy		Date 02/17/95	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature John L Wallberg		Date 02/17/95	
Printed/Typed Name John L Wallberg		Signature		Date	
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name Casalia Resources		Signature J. M. K. K. K.		Date 12/11/95	

GENERATOR COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Return to Generator

2. Page 1
of 1Information in the shaded areas
is not required by Federal
law.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. C A D 0 0 8 3 2 5 1 1 0		Document No. 0 0 0 0 2		A. State Manifest Document Number 84582043	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Rangethorpe Fullerton, Ca 92634 714-632-0181						B. State Generator's ID	
4. Generator's Phone		5. Transporter 1 Company Name J. Cal Transportation		6. US EPA ID Number CAD 980814883		C. State Transporter's ID 59583	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (213) 920-7109		E. State Transporter's ID	
9. Designated Facility Name and Site Address Casmalia Resources NTU Road Casmalia, Ca 93429		10. US EPA ID Number C A D 0 2 0 7 4 8 1 2 5		F. Transporter's Phone		G. State Facility's ID CAD020748125	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
a. Hazardous Waste Solid nos ORMOE NA 9189		001 DT		15		I 611	
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above Per EPA SCMS 6014602 - SANDS CONTAINING IN mg/kg 0-73 n-hex-HI, Trichloroethene 0-67 Ethylbenzene 0-21 Toluene 0-95 xylene 0-70 Trichloroethylene 0-11 Toluene						K. Handling Codes for Wastes Listed Above 03	
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.							
Printed/Typed Name HARRY L. MURPHY				Signature <i>Harry L. Murphy</i>		Date 2/1/85	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name JAMES ARONSON				Signature <i>James Aronson</i>		Date 02/11/85	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. # 59875-31,460 lbs.							
Printed/Typed Name CASMAIA Resources				Signature <i>Alice Priest</i>		Date 02/11/85	

APPENDIX J

DEPARTMENT OF HEALTH SERVICES COMMENT LETTER
ON REMEDIATION AND EXCAVATION PLAN

DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7128
LOS ANGELES, CA 90012
(213) 620-2380



February 20, 1985

Robert Phillips
Trent Tube Division
Colt Industries
P. O. Box 88
Pittsburgh, PA 15230

EXCAVATION AND/OR CHARACTERIZATION OF CONTAMINATION OF CONTAMINATED SOILS
AT TRENT TUBE FACILITY FULLERTON, CALIFORNIA CAD 008325110

Dear Mr. Phillips:

This to confirm the February 11, 1985 discussion between you and Roy Thielking of my staff concerning the February 1, 1985 excavation plan you submitted to this office as part of the Facility Closure Plan.

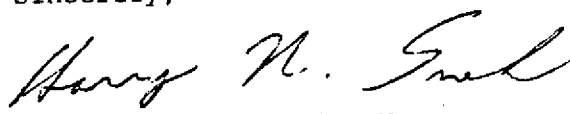
The volume of soil within a semicircle defined by boring locations D-1, C-3 and D-3 on Figure 8 of the plan and within five feet of the surface must either be excavated and removed as hazardous waste to a legal point of disposal or be further characterized to show that portions thereof are not contaminated with more than five parts per million of hazardous wastes.

Your proposal to excavate and aerate the outlying portions of Area B which were found to have less than five parts per million of contamination is acceptable.

You are directed to submit to this office by March 15, 1985, a written plan for characterization, and, if appropriate, excavation of contaminated soils south of boring D-2 and between the Trent Tube property line and the flood control channel.

Should you have any questions or wish to meet with my staff, please call Roy Thielking.

Sincerely,

for 
John A. Hinton, P.E., Manager
Facility Permitting Unit
Toxic Substances Control Division

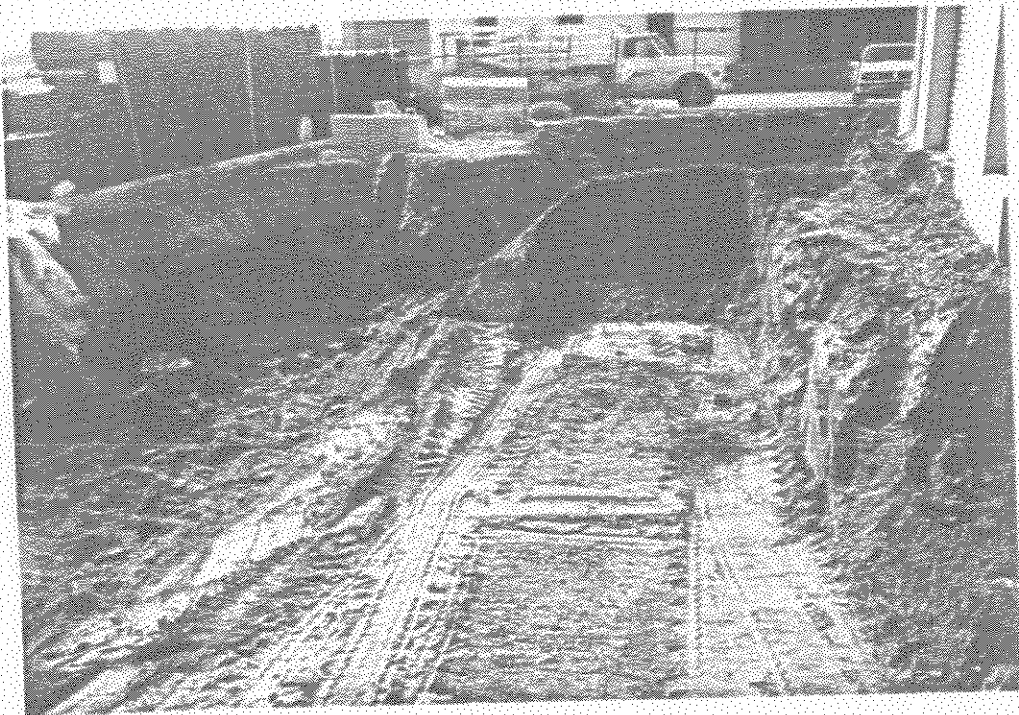
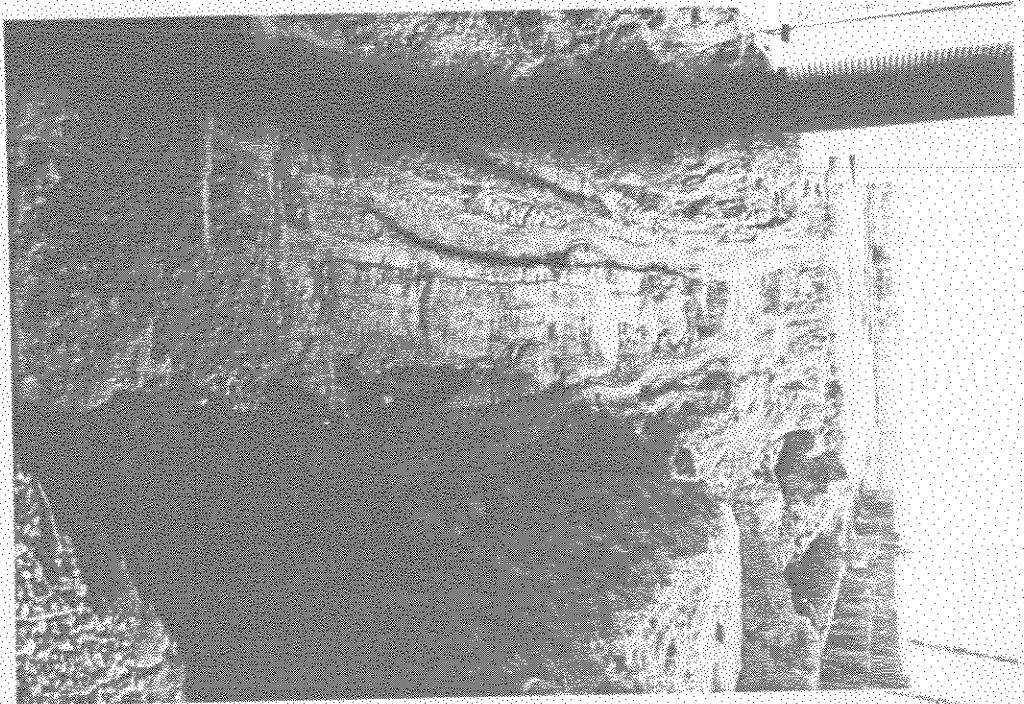
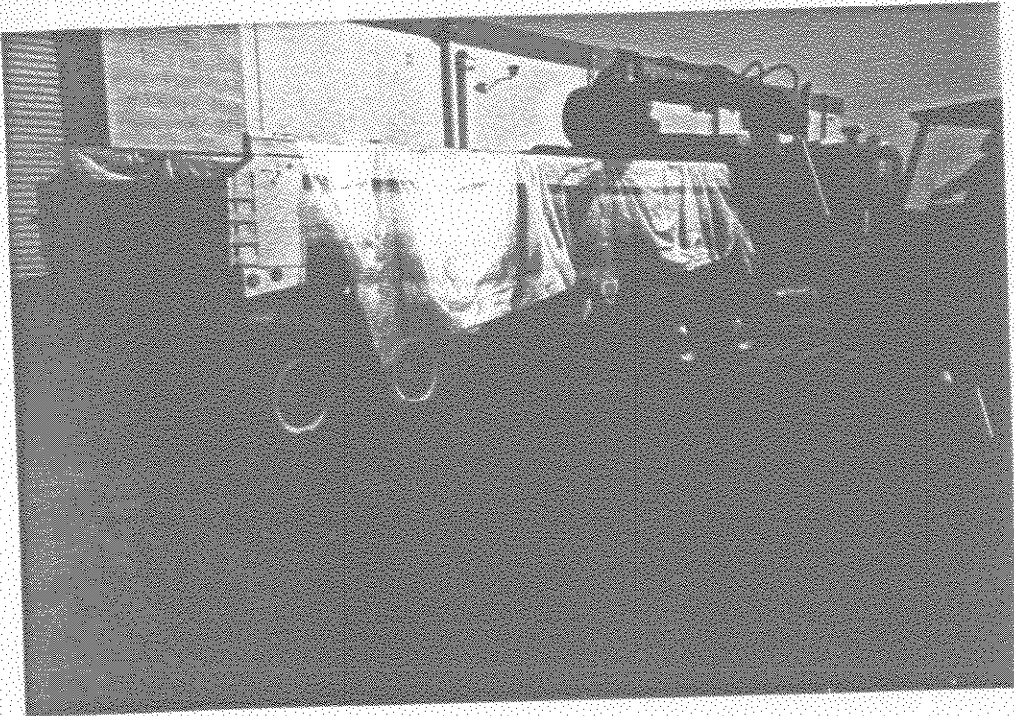
JAH:RT/mw

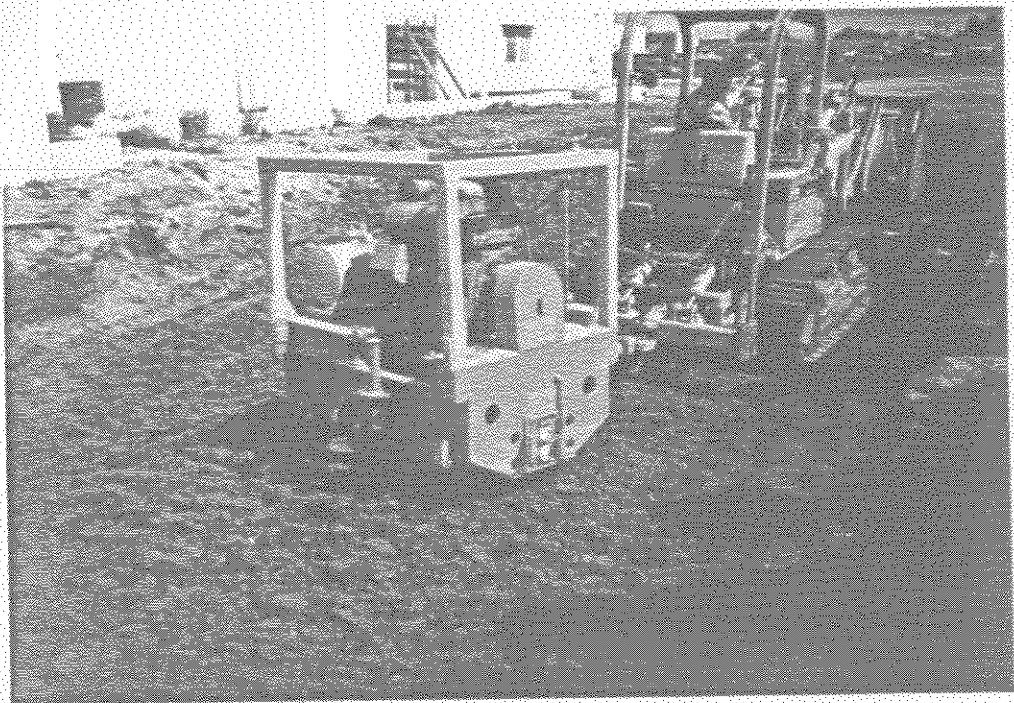
cc: California Regional Water Quality Control Board
South Coast Air Quality Management District
Gibson Dunn & Crutcher
Attn: Wayne Smith

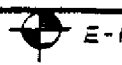
NGSC-DTSC005141

APPENDIX K

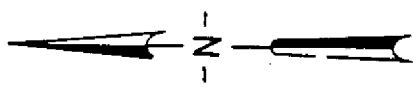
PHOTOGRAPHS SHOWING REMEDIATION, DRAWINGS OF
REVISED EXCAVATION LIMITS AND
MANIFESTS SHOWING PROPER DISPOSAL OF
CONTAMINATED SOIL SHIPPED TO DISPOSAL AT
CASMALIA RESOURCES - FEBRUARY 25-28, 1985

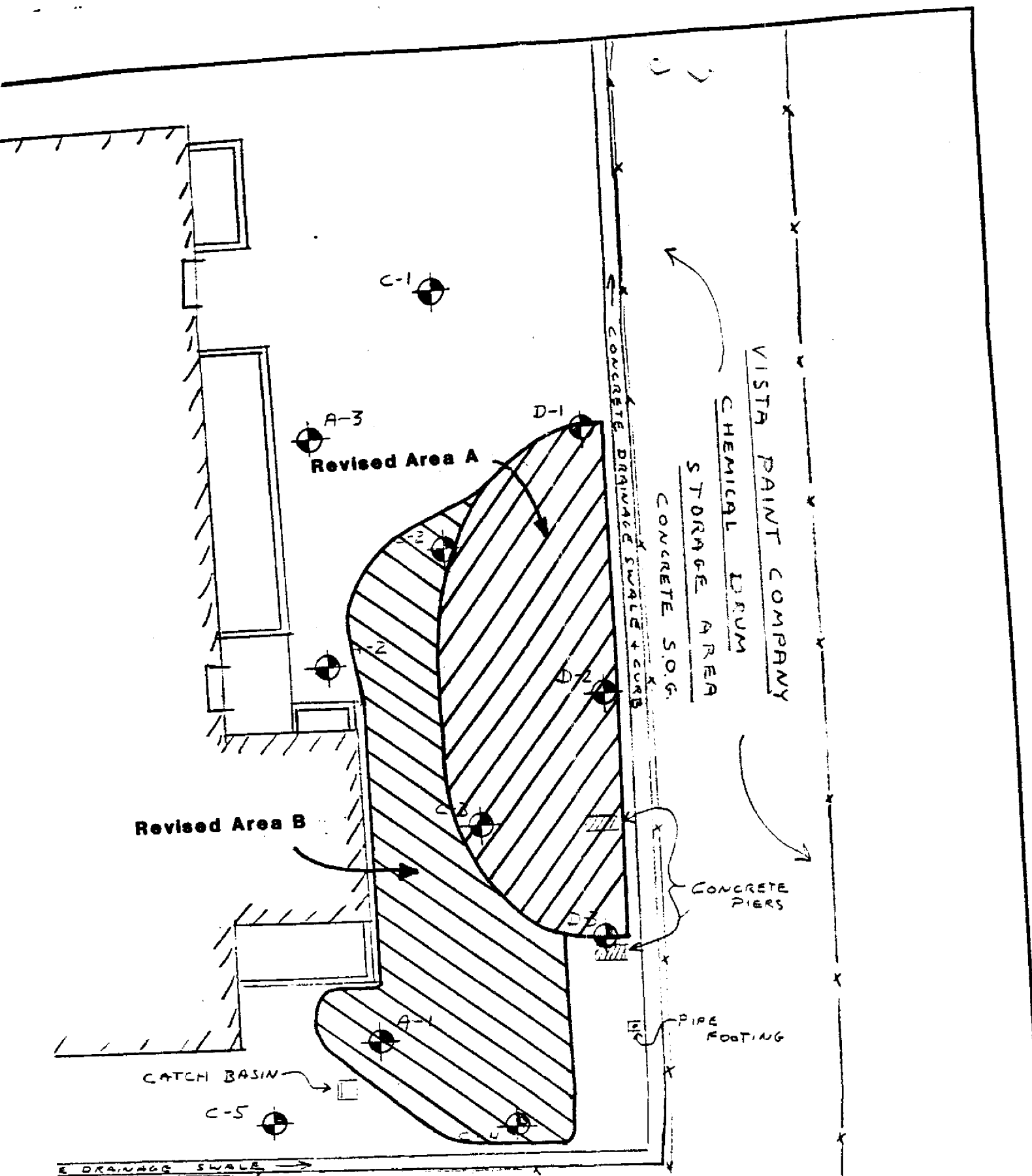




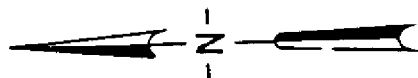


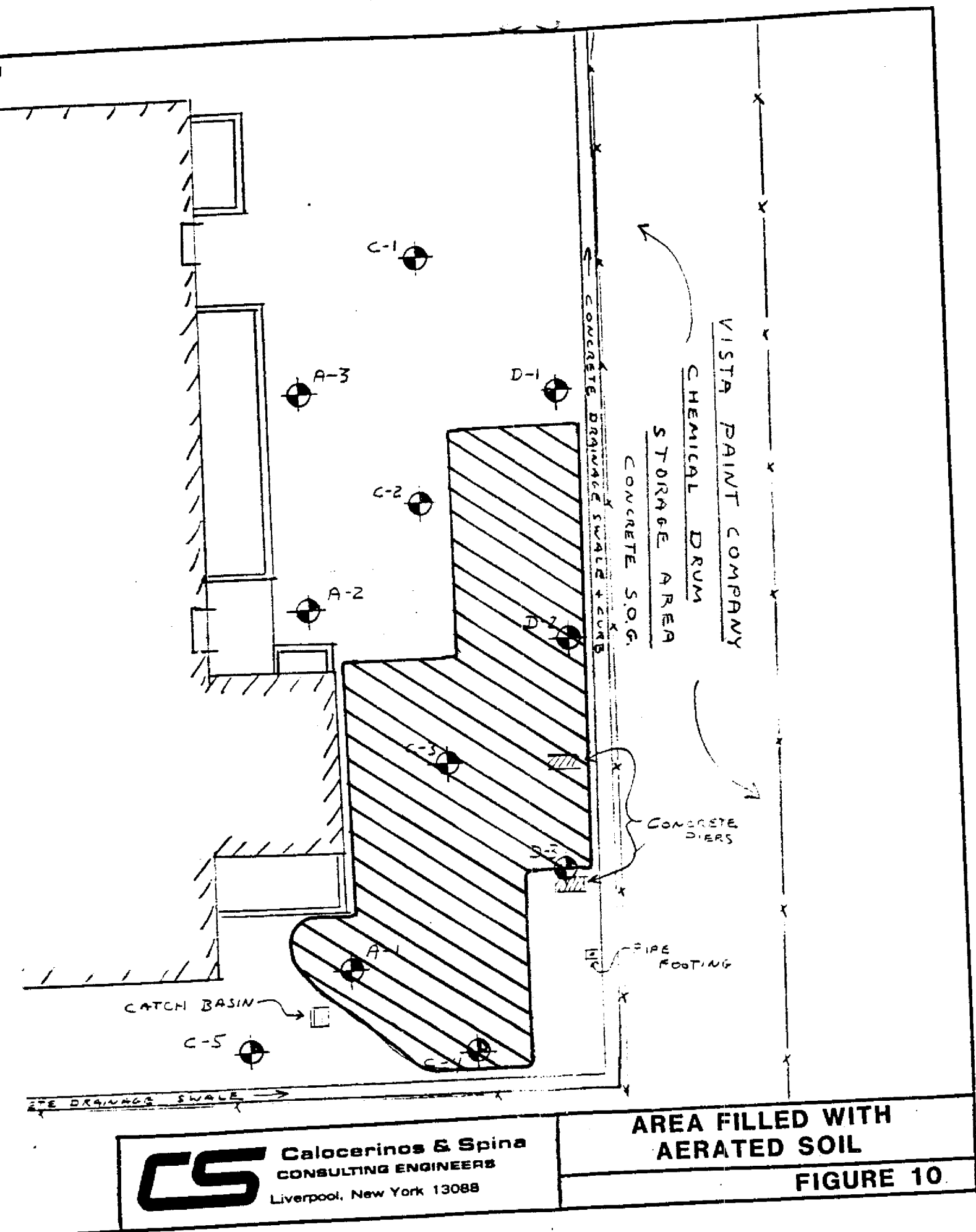
TRENT TUBE
PLANT





TRENT TUBE
PLANT





Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92634		714-632-0181	CAD0083251100000	A. State Manifest Document Number 84582032		
4. Generator's Phone		5. Transporter 1 Company Name J-CAI TRANSPORTATION	6. US EPA ID Number CAD980814883	B. State Generator's ID		
7. Transporter 2 Company Name		8. US EPA ID Number	C. State Transporter's ID 52587			
9. Designated Facility Name and Site Address Casualia Resources NTU Road Casualia, Ca 93429		10. US EPA ID Number ICAD020748125	D. Transporter's Phone 714-221-7714			
			E. State Transporter's ID			
			F. Transporter's Phone			
			G. State Facility's ID			
			H. Facility's Phone 805-977-8440			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	1. Waste No.	
		No.	Type	WT/Vol		
a. Hazardous Waste Solid noc		001	DR	14	Y	611
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Per EPA 601+602 Scan - Sand Containing in Mg/Kg 0-150-1, 1, 1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-20 Trichloroethylene 0-1.3 Toluene		K. Handling Codes for Wastes Listed Above 03				
15. Special Handling Instructions and Additional Information gloves & goggles						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name HARRY L MURPHY		Signature Harry L Murphy		Date Month Day Year		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Bob Jarvis		Date Month Day Year 02/25/85		
Printed/Typed Name BOB JARVIS		Signature		Date		
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date Month Day Year		
Printed/Typed Name		Signature		Date		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. # 41344 - 25,700 lbs.						
Printed/Typed Name Casualia Resources		Signature Carol J. Smith		Date Month Day Year 02/25/85		

Please print or type. (Form designed for use on 12 inch wide paper)

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID Number		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92634 4. Generator's Phone () 714-632-0181						A. State Manifest Document Number 84582033							
5. Transporter 1 Company Name J. CAL. TRANSPORTATION						B. State Generator's ID							
6. US EPA ID Number KAD980814883						C. State Transporter's ID 53584							
7. Transporter 2 Company Name						D. Transporter's Phone 213 920-7709							
8. US EPA ID Number						E. State Transporter's ID							
9. Designated Facility Name and Site Address Casualties Resources NTU Road Casualties, Ca 93429						F. Transporter's Phone							
10. US EPA ID Number ICAD020748125						G. State Facility's ID CAD020748125							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						H. Facility's Phone 805-937-8440							
						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. Hazardous Waste Solid nos NA 9189 ORM-B						0.03 DT		14		T		611	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above Per EPA 40 CFR 261.23(c) - Send Containing in mg/kg 0-780 1,1,1-Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene						K. Handling Codes for Wastes Listed Above 03							
15. Special Handling Instructions and Additional Information gloves & goggles													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.													
Printed/Typed Name HARRY L. MURPHY						Signature Harry L. Murphy		Date Month Day Year					
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature Tommy M. Bain		Date Month Day Year 02/25/85					
18. Transporter 2 Acknowledgement or Receipt of Materials						Signature		Date Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. # A1334-35, 000/65						Date Month Day Year 10/25/85							
Printed/Typed Name Casualties Resources						Signature [Signature]		Date Month Day Year					

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID Number	2. Manifest Document No.	3. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Front Tube 2100 E. Gangethorpe Fullerton, Ca 92631		A. State Manifest Document Number 84582034		B. State Generator's ID	
4. Generator's Phone 714-632-0181		C. State Transporter's ID 51521		D. Transporter's Phone 715-920-7709	
5. Transporter 1 Company Name T-CAL Trans		6. US EPA ID Number KAD980814883		E. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		F. Transporter's Phone	
9. Designated Facility Name and Site Address Casmalia Resources NTU Road Casmalia, Ca 93429		10. US EPA ID Number LCAD020748320		G. State Facility's ID 805-937-8449	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	
a. Hazardous Waste Solid non		No. 001		Type DR	
b. ORM-E		HA 9182		14. Unit Wt/Vol 14	
c. 611				15. Waste No.	
d. 611					
J. Additional Descriptions for Materials Listed Above Per EPA 601+602 Scans - Solids Containing in Mg/Kg 0-750 1,1,1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene		K. Handling Codes for Wastes Listed Above 03			
15. Special Handling Instructions and Additional Information Gloves + Goggles					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name Harry L. Murphy		Signature Harry L. Murphy		Date 2/26/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Ellen Small		Signature Ellen Small	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. # 411476-27, 460165					
Printed/Typed Name Casmalia Resources		Signature Carol J. Rust		Date 02/26/85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. C A D 0 0 8 3 2 5 1 1 0	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangewood Fullerton, Ca 92630		6. US EPA ID Number R A 0 9 8 0 8 1 4 8 8 5		A. State Manifest Document Number 84582035	
4. Generator's Phone 714-225-0151		8. US EPA ID Number		B. State Generator's ID 000000	
5. Transporter 1 Company Name J-Cal Transportation		10. US EPA ID Number C A D 0 2 0 7 4 8 1 2 5		C. State Transporter's ID 53585	
7. Transporter 2 Company Name				D. Transporter's Phone (714) 910-789	
9. Designated Facility Name and Site Address Casualia Resources NTU Road Casualia, Ca 95629				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID CAD020748125	
				H. Facility's Phone 815-937-8449	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Hazardous waste Solid nos OPM-E HA 9189		0 0 1	D T	1 4	Y
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Per EPA 601 + 602 Scans - Sand Containing in Mg/Kg 0-700 1,1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Trichloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene		K. Handling Codes for Wastes Listed Above 03			
15. Special Handling Instructions and Additional Information Gloves + Goggles					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name HARRY L. MURPHY		Signature Harry L. Murphy		Date Month Day Year 12 26 85	
17. Transporter 1 Acknowledgement or Receipt of Materials		Signature Don Baint		Date Month Day Year 12 26 85	
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. # 41475-35, 300 lbs					
Printed/Typed Name Casualia Resources		Signature Caulphoto		Date Month Day Year 12 26 85	

GENERATOR COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Return to Generator

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. C A D 0 0 8 3 2 5 1 1 0 0 0 0 0	Manifest Document No. of 1	2. Page 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Grangerthorpe Fullerton, Ca 92634 Generator's Phone (714) 632-0181			A. State Manifest Document Number 84582039		B. State Generator's ID	
5. Transporter 1 Company Name J. CAL TRANS			6. US EPA ID Number C A D 9 8 0 8 1 4 8 8 3		C. State Transporter's ID 36046	
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone 213 920-7709	
9. Designated Facility Name and Site Address Casamalia Resources NTU Road Casamalia, Ca 93429			10. US EPA ID Number C A D 0 2 0 7 4 8 1 2 5		E. State Transporter's ID	
					F. Transporter's Phone	
					G. State Facility's ID CA020048125	
					H. Facility's Phone 805-937-8449	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Unit	15. Waste No.
a. Hazardous Waste Solid nos ORM-R HA 9189			No. Type			
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Per EPA 401.2-602 Solids; Solids containing in mg/kg 0-750 Ethylchlorobenzene 0-1.1 Ethylbenzene 0-21 tetrachloroethylene 0-95 Xylene 0-70 trichloroethylene 0-1.3 Toluene			K. Handling Codes for Wastes Listed Above 03			
16. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name HARRY L. MURPHY			Signature Harry L. Murphy		Date Month Day Year 10-21-85	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature John L. Wallberg		Date Month Day Year 10-21-85	
Printed/Typed Name John L. Wallberg			Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Date	
Printed/Typed Name			Signature		Date	
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. # 41330-29380165						
Printed/Typed Name Casamalia Resources			Signature Curt Schuster		Date Month Day Year 10-21-85	

GENERATOR COPY

Please print or type. (Form designed for use on elite (12 pitch) typewriter)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92634		4. Generator's Phone 714-632-0181	A. State Manifest Document Number 84582040		
5. Transporter 1 Company Name Industrial Waste Disposition		6. US EPA ID Number	B. State Generator's ID		
7. Transporter 2 Company Name J-Cal Transportation		8. US EPA ID Number CA D 980814883	C. State Transporter's ID		
9. Designated Facility Name and Site Address Casualia Resources NTU Road Casualia, Ca 93429		10. US EPA ID Number CA D 020748125	D. Transporter's Phone 53585		
			E. State Transporter's ID		
			F. Transporter's Phone (213) 920-7709		
			G. State Facility's ID		
			H. Facility's Phone 805-037-8440		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	15. Waste No.
a. Hazardous Waste Solid res		No. Type			
b. CA 7189		0 0 1 DT	14	Y	611
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
Per EPA Reg. 261.23(a)(1) - Sent for recycling in Mg/Kg 0-70% Ethylbenzene 0-1.1 Ethylbenzene 0-21% Ethylbenzene 0-95 Xylene 0-70% Ethylbenzene 0-1.3 Toluene		03			
15. Special Handling Instructions and Additional Information					
Shipment never presented to Transporter # 1. -gloves & goggles					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name		Signature		Date	
HARRY L. MURPHY		Harry L. Murphy		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
DON BAIN		Don Bain		2/2/85	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
				Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Date	
Casualia Resources		Carol A.		10/25/85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Grangerthorpe Fullerton, Ca 92634		714-632-0181	CAD008325110	A. State Manifest Document Number 84582064		
4. Generator's Phone		5. Transporter 1 Company Name J-Cal Transportation	6. US EPA ID Number ICAD 780814883	B. State Generator's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID 52587		
9. Designated Facility Name and Site Address Casualia Resources XTU Road Casualia, Ca 95629		10. US EPA ID Number CAD020748125		D. Transporter's Phone 813 920-7709		
				E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 805-577-8800		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Unit	15. Waste No.
a. Hazardous Waste Solid non			No. Type			
ORM-E NA 9189			0 0 1 DT	1 h	Y	611
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
Per EPA 601+602 Scans - Sands containing in My/Kg 0-780 1,1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene						
15. Special Handling Instructions and Additional Information						
Gloves + Goggles						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name		Signature		Date		
HARRY L MURPHY		Harry L Murphy		02 2 785		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Date		
BOB JARVIS		Bob Jarvis		02 2 785		
18. Transporter 2 Acknowledgement or Receipt of Materials						
Printed/Typed Name		Signature		Date		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Date		

Please print or type. (Form designed for use on 8 1/2 x 11 inch typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Treat Tube 2100 E. Orangethorpe Fullerton, Ca 92634		6. US EPA ID Number CAD 980814883	A. State Manifest Document Number 84582065		
4. Generator's Phone 714-632-0181		7. US EPA ID Number	B. State Generator's ID		
5. Transporter 1 Company Name J-Cal Transportation		8. US EPA ID Number	C. State Transporter's ID 33584		
7. Transporter 2 Company Name		9. US EPA ID Number	D. Transporter's Phone 313 920-7709		
8. Designated Facility Name and Site Address Casmalia Resources NTU Road Casmalia, Ca 93429		10. US EPA ID Number C.A.D.0.2.0.7.4.8.1.2.5	E. State Facility's ID CAD020748125		
			F. Facility's Phone 805-937-8449		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit M/L	15. Waste No.
a. Hazardous Waste Solid non ORM-E NA 9189		0 0 1 D T	1 4	Y	611
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Per EPA 601.6025 cans - Solids Containing in M/L/Kg 0-780 1,1 Trichloroethene 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene		K. Handling Codes for Wastes Listed Above 03			
15. Special Handling Instructions and Additional Information Gloves + Goggles					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name HARRY L. MURPHY		Signature <i>Harry L. Murphy</i>		Date 2/27/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Tommy M. Bain</i>		Date 02/27/85	
Printed/Typed Name TOMMY M. BAIN		Signature		Date	
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. # 41636-34,240 lbs					
Printed/Typed Name Casmalia Resources		Signature <i>Casmalia Resources</i>		Date 02/27/85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92634		6. US EPA ID Number 714-632-0181		A. State Manifest Document Number 84582066	
4. Generator's Phone 714-632-0181		8. US EPA ID Number CAD980814883		B. State Generator's ID	
5. Transporter 1 Company Name J-Cal Transportation		10. US EPA ID Number CAD020748125		C. State Transporter's ID 56046	
7. Transporter 2 Company Name		12. Containers		D. Transporter's Phone 714-920-7709	
9. Designated Facility Name and Site Address Casmalia Resources HTU Road Casmalia, Ca 92029		13. Total Quantity 14		E. State Transporter's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Hazardous Waste Solid non ORM-E NA 9189		14. Unit 14		F. Transporter's Phone	
12. Containers 001 DT		15. Facility's ID 805-977-8440		G. State Facility's ID	
13. Total Quantity 14		16. Facility's Phone 805-977-8440		H. Facility's Phone	
14. Unit 14		17. Additional Descriptions for Materials Listed Above Per EPA 601+602 Scans - Solids Containing in M/L/K 0-700 1,1,1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene		18. Handling Codes for Wastes Listed Above 03	
15. Facility's ID 805-977-8440		19. Special Handling Instructions and Additional Information Gloves & Goggles		20. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.		21. Transporter 1 Acknowledgement of Receipt of Materials		Date Month Day Year 07-27-85	
22. Transporter 2 Acknowledgement of Receipt of Materials		23. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Date Month Day Year 07-27-85	
24. Discrepancy Indication Space		25. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Date Month Day Year 07-27-85	
26. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		27. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Date Month Day Year 07-27-85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

GENERATOR COPY

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's Name and Mailing Address	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address		Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92631 714-632-0181		A. State Manifest Document Number 84582067	
4. Generator's Phone		5. Transporter 1 Company Name		B. State Generator's ID	
		J. Cal Transportation		C. State Transporter's ID 58971	
6. US EPA ID Number		7. Transporter 2 Company Name		D. Transporter's Phone (714) 920-7709	
CA 0980814883				E. State Transporter's ID	
8. US EPA ID Number		9. Designated Facility Name and Site Address		F. Transporter's Phone	
		Casamia Resources NTU Road Casamia, Ca 93423		G. State Facility's ID	
10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		H. Facility's Phone	
CA 020748125		12. Containers		13. Total Quantity	
		No. Type		14. Unit	
		15. Special Handling Instructions (and Additional Information)		1. Waste No.	
		Gloves + Goggles			
		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.			
17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials		K. Handling Codes for Wastes Listed Above	
Printed/Typed Name		Signature		03	
HARRY L. MURPHY		Harry L. Murphy			
19. Discrepancy Indication Space		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in		Date	
		Item 19-714/645-42, 140 lbs.		Month Day Year	
Printed/Typed Name		Signature		Date	
Casamia Resources		Jelen Panksta		02 27 85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Trent Tube 2100 E. Grangerthorpe Fullerton, Ca 92634		1. Generator's US EPA ID No. CAD008335210		A. State Manifest Document Number 84582068	
4. Generator's Phone 714-632-0181		5. Transporter 1 Company Name J-Cal Transportation	6. US EPA ID Number CAD980814883	B. State Generator's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID 53585	
9. Designated Facility Name and Site Address Casmalia Resources RTU Road Casmalia, Ca 9429		10. US EPA ID Number CAD020748125		D. Transporter's Phone 213 920-7149	
				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 805 937-8449	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	15. Waste No.
		No.	Type		
a. Hazardous Waste Solid non		01	DT	14	611
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Per EPA 601 & 602 Solids Containing in kg/kg 0-100 1,1,1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachlorethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene		K. Handling Codes for Wastes Listed Above 03			
15. Special Handling Instructions and Additional Information Gloves + Goggles					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name HARRY L MURPHY		Signature Harry L Murphy		Date Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Dan Bain		Date Month Day Year 2/27/85	
Printed/Typed Name Dan Bain		Signature		Date Month Day Year	
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date Month Day Year	
Printed/Typed Name		Signature		Date Month Day Year	
19. Discrepancy Indication Space NONE					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. # 41674-36780165					
Printed/Typed Name C.R.C. Res. Marc Crosby		Signature Marc Crosby		Date Month Day Year 11/2/85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID Number	2. Page 1	Information in the shaded area is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92634		1. Generator's US EPA ID Number C.A.D. 00832593	2. Page 1	3. State Test Document Number 84372069	
4. Generator's Phone 714-632-0181		5. US EPA ID Number C.A.D. 980814553	6. State Generator's ID		
5. Transporter 1 Company Name J-Cal Transportation		6. US EPA ID Number C.A.X. 000074110	7. State Transporter's ID 52585		
7. Transporter 2 Company Name HOYT TRANS.		8. US EPA ID Number C.A.X. 000074110	8. State Transporter's Phone 714-732-4499		
9. Designated Facility Name and Site Address Casamia Resources NTU Road Casamia, Ca 93429		10. US EPA ID Number C.A.D. 020748125	9. State Facility's ID C.A.D. 020748125		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. Hazardous Waste Solid neg CHM-E HA 9189		No. Type	14 Y	611	
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Per EPA 604+602 Scans - 55 Sands Containing in Mg/Kg 0-780 1,1,1 Trichloroethene 10-1.1 Ethylbenzene 0-21 Tetrachloroethylene 8-95 Xylene 0-70 Trichloroethylene 8-1.7 Toluene		K. Handling Codes for Wastes Listed Above 03			
16. Special Handling Instructions and Additional Information Gloves + Goggles					
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name HARRY L MURPHY		Signature Harry L Murphy		Date 12/27/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Mike Hoyt		Date 12/27/85	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space Waste never presented to J-Cal. Line 7 is transporter #1 C. Temple for Test.					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Signature Casamia Resources		Date 02/27/85	

GENERATOR COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CA D 0 0 8 3 2 5 1 2 0		2. Page 1 of 1 (Information in the shaded areas is not required by Federal law.)	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92631				A. State Manifest Document Number 84582070	
4. Generator's Phone () 714-632-0181				B. State Generator's ID	
5. Transporter 1 Company Name J-CAL TRANS		6. US EPA ID Number CA D 9 9 0 8 1 4 8 3		C. State Transporter's ID 52528	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 639-9493	
9. Designated Facility Name and Site Address Casmalia Resources NTU Road Casmalia, Ca 93429				E. State Transporter's ID	
10. US EPA ID Number CA D 0 2 0 7 4 8 1 2 5				F. Transporter's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				G. State Facility's ID CA D 0 2 0 7 4 8 1 2 5	
				H. Facility's Phone 835-937-8449	
12. Containers				13. Total Quantity	
No. Type				Unit Wt/Vol	
a. 11 Hazardous waste Solid 001 OT				14X 611	
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Per EPA 601+602 Scans 2 Samples Containing in M/L/Ks 0-780 T. Trichloroethane 0-1.1 Ethyl Benzene 0-21 Tetrachlorethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene				K. Handling Codes for Wastes Listed Above 03	
15. Special Handling Instructions and Additional Information Glasses + Gloves					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
Printed/Typed Name HARRY L MURPHY				Signature Harry L Murphy	
17. Transporter 1 Acknowledgement of Receipt of Materials				Date 12/26/85	
Printed/Typed Name STEVE HOLT				Signature Steve Holt	
18. Transporter 2 Acknowledgement or Receipt of Materials				Date 12/26/85	
Printed/Typed Name				Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 # 41488-321920 lbs.					
Printed/Typed Name Casmalia Resources -				Signature John Pauksta	
				Date 12/26/85	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Sanchez Construction Trent Tube 2100 E. Orangethorpe Pullerton, Ca 92631		714 (612) 714-8114		A. State Manifest Document Number 82071		
4. Generator's Phone		5. Transporter 1 Company Name J-CAL TRANSPORTATION		C. State Transporter's ID 52587		
6. Transporter 1 US EPA ID Number CA D 0814883		7. Transporter 2 Company Name		D. Transporter's Phone 714-811474		
8. Transporter 2 US EPA ID Number		9. Designated Facility Name and Site Address Casmalia Resources RTU Road Casmalia, Ca 93429		E. State Transporter's ID		
10. US EPA ID Number CA D 020748125		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		F. Transporter's Phone 804-977-8449		
		12. Containers		13. Total Quantity		14. Unit
		No. Type		Quantity		Wt/Vol
a. Hazardous Waste Solid non ORM-E HA 9189		0 0 1 DT		1 A Y		611
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Per EPA 601 + 602 Scans - Sands Containing in My/kg 0-780 6,6,1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.3 Toluene		K. Handling Codes for Wastes Listed Above 03				
15. Special Handling Instructions and Additional Information Gloves + Goggles						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name HARRY L. MURPHY		Signature <i>Harry L. Murphy</i>		Date 02/26/85		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name BOB JARVIS		Signature <i>Bob Jarvis</i>		Date 02/26/85
18. Transporter 2 Acknowledgement or Receipt of Materials		Printed/Typed Name		Signature		Date
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 #4477-29,080/65.						
Printed/Typed Name Casmalia Resources		Signature <i>Eden Paulista</i>		Date 02/26/85		

Please print or type. (Form designed for use with a typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trant Tube 2100 E. Crangethorpe Fullerton, CA 92631		Return To Generator		A. State Manifest Document Number 84582072	
4. Generator's Phone 714-632-0181		5. Transporter 1 Company Name J. CAL TRANS		B. State Generator's ID	
6. US EPA ID Number KAD780314823		7. Transporter 2 Company Name		C. State Transporter's ID 56046	
8. US EPA ID Number		9. Designated Facility Name and Site Address Casmalia Resources NTU Road Casmalia, Ca 93429		D. Transporter's Phone 213 920-7709	
10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		E. State Transporter's ID	
12. Containers		13. Total Quantity		F. Transporter's Phone	
14. Unit		15. Waste No.		G. State Facility's ID	
a.		b.		H. Facility's Phone	
c.		d.		I. Additional Descriptions for Materials Listed Above	
e.		f.		K. Handling Codes for Wastes Listed Above	
g.		h.		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.	
i.		j.		17. Transporter 1 Acknowledgement of Receipt of Materials	
k.		l.		18. Transporter 2 Acknowledgement of Receipt of Materials	
m.		n.		19. Discrepancy Indication Space	
o.		p.		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.	
q.		r.		21. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.	

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Trent Tube 2100 E. Orangethorpe Fullerton, Ca 92631				Return To Generator 714-632-0181			
4. Generator's Phone				A. State Manifest Document Number 84582073			
5. Transporter 1 Company Name J. CAL. TRANSPORTATION				B. State Generator's ID			
6. US EPA ID Number CA 0980814883				C. State Transporter's ID 53584			
7. Transporter 2 Company Name				D. Transporter's Phone 213 920-7709			
8. US EPA ID Number				E. State Transporter's ID			
9. Designated Facility Name and Site Address Casmalia Resources RTU Road Casmalia, Ca 93429				F. Transporter's Phone			
10. US EPA ID Number CA 020748125				G. State Facility's ID CA 020748125			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity	
a. Hazardous Waste Solid nos ORN-E RA 9189				0 0 1 DT		1 4 T	
b.							
c.							
d.							
15. Additional Descriptions for Materials Listed Above Per EPA 601 + 602 Scans - Sands Containing in Mg/Kg 0-780 1,1,1 Trichloroethane 0-1.1 Ethylbenzene 0-21 Tetrachloroethylene 0-95 Xylene 0-70 Trichloroethylene 0-1.7 Toluene				K. Handling Codes for Wastes Listed Above 03			
16. Special Handling Instructions and Additional Information Gloves + Goggles							
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.							
Printed/Typed Name HARRY L. MURPHY				Signature <i>Harry L. Murphy</i>		Date Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Tommy M. Bain</i>		Date Month Day Year 02/26/85	
Printed/Typed Name TOMMY M. BAIN				Signature		Date Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date Month Day Year	
Printed/Typed Name				Signature		Date Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. # 41451-29200/65							
Printed/Typed Name Casmalia Resources				Signature <i>Carol Johnston</i>		Date Month Day Year 02/26/85	